

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TRENESHA BIGGERS,
M.F., a child, and Z.S., a child

Write the full name of each plaintiff.

22 cv 8648

(Include case number if one has been assigned)

-against-

SECOND AMENDED
COMPLAINT

LAURA TAYLOR SWAIN, JOHN ZIMMER,
THE NEW YORK DEPARTMENT OF
CHILDREN AND FAMILY SERVICES,
NEW YORK CITY ACS, "SEE ATTACHED"

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

42 U.S.C. 1982, 42 U.S.C. 1983, 42 U.S.C. 1985, 42 U.S.C.
1986, 42 U.S.C. 1988, 18 U.S.C. 1201, 18 U.S.C. 2261
5 U.S.C. 552, 18 U.S.C. 373, "SEE ATTACHED"

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, TRENESHA BIGGERS, is a citizen of the State of
 (Plaintiff's name)

NEW YORK
 (State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

N/A

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual: "SEE ATTACHED"

The defendant, LAURA TAYLOR SWAIN, is a citizen of the State of
(Defendant's name)

NEW YORK

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, WORLD WRESTLING ENTERTAINMENT, is incorporated under the laws of
the State of Connecticut

and has its principal place of business in the State of Connecticut

or is incorporated under the laws of (foreign state)

and has its principal place of business in

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

TRENESHA BIGGERS

First Name

Middle Initial

Last Name

Confidential

Street Address

NEW YORK, NY

County, City

State

Zip Code

Confidential

Telephone Number

* on file with the Court *

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

LAURA TAYLOR SWAIN
 First Name Last Name
District Judge
 Current Job Title (or other identifying information)
500 Pearl St. Courtroom 17C
 Current Work Address (or other address where defendant may be served)
New York, NY 10007-1312
 County, City State Zip Code

Defendant 2:

YAHARA GUTIERREZ
 First Name Last Name
District Judge
 Current Job Title (or other identifying information)
500 E. San Antonio Ave Rm 1105
 Current Work Address (or other address where defendant may be served)
EL PASO, Texas 79901-2425
 County, City State Zip Code

Defendant 3:

ASHLEY MARTINEZ
 First Name Last Name
Assistant District Attorney
 Current Job Title (or other identifying information)
500 E San Antonio Ave. 2nd Floor
 Current Work Address (or other address where defendant may be served)
EL PASO, TEXAS 79901
 County, City State Zip Code

Defendant 4: SAMUEL 'SAM' MEDRANO
District Judge
500 E. SAN ANTONIO AVE Rm 702
EL PASO, Texas 79901

Defendant **5**: VERONICA UERMA
First Name Last Name
Attorney
Current Job Title (or other identifying information)
1417 Montana Ave
Current Work Address (or other address where defendant may be served)
EL PASO, TX 79902
County, City State Zip Code

Additional Defendants Attached

III. STATEMENT OF CLAIM

Place(s) of occurrence: NEW YORK, TEXAS, ILLINOIS, FLORIDA, NEW MEXICO, "see attached"

Date(s) of occurrence: October 8 2019, October 2021, "see attached"

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

"See Attached"

"See Attached"

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

"See Attached"

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

"See Attached"

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

09/10/2023
 Dated _____ Plaintiff's Signature [Signature]
TRENESHA D BIGGERS
 First Name Middle Initial Last Name
* Confidential *
 Street Address _____
New York, New York
 County, City State Zip Code
Confidential * on file with the Court *
 Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

Document has been provided to the Court.

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
TRENESHA BIGGERS, M.F. a child,
and Z.S., a child

Plaintiffs,

- against-

**Case #: 22-CV-8648
SECOND AMMENDED COMPLAINT
FOR DAMAGES**

PURSUANT TO:

**42 U.S.C § 1983
42 U.S.C. 1985
42 U.S.C. § 1986
42 U.S.C. § 1988
18 U.S.C. § 1201
18 U.S.C. § 2261
ADULT SURVIVORS ACT
18 U.S.C § 373
5 U.S.C. § 552**

JURY TRIAL DEMANDED

LAURA TAYLOR SWAIN individually and in official capacity
JOHN ZIMMER individually and in official capacity
THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES
NEW YORK CITY ACS
THE UNITED STATES MARSHAL SERVICE
NEW YORK/NEW JERSEY FUGITIVE TASK FORCE
CENTER FOR MISSING AND EXPLOITED CHILDREN
PRISON TRANSPORT SYSTEMS
SDNY PRO SE INTAKE UNIT
DELIA CONLON individually and in official capacity
SUFFOLK COUNTY DEPARTMENT OF SOCIAL SERVICES
KURT ANGLE individually and in official capacity
HEATH WALLACE MILLER individually and in official capacity
JOHN HUETT individually and in official capacity
SUFFOLK COUNTY DISTRICT ATTORNEY'S OFFICE
EL PASO COUNTY TEXAS DISTRICT ATTORNEY'S OFFICE
MANHATTAN DISTRICT ATTORNEY'S OFFICE
THE MANHATTAN FAMILY JUSTICE CENTER

OLIVIA WILSON individually and in official capacity
TRAVIS HOLMES individually and in official capacity
ALVIN BRAGG individually and in official capacity
THE NEW YORK COUNTY PUBLIC DEFENDER
LAUREN ANGELO individually and in official capacity
CHARANYA VISWANATHAN individually and in official capacity
ROBIN MCCABE individually and in official capacity
CHRISTINA KANSKO individually and in official capacity
ELIZABETH RAIMOND individually and in official capacity
SHIRLEY NEW YORK POLICE DEPARTMENT
THE HAMLET OF SHIRLEY, NEW YORK
SUFFOLK COUNTY NEW YORK
THE STATE OF NEW YORK
RIVERHEAD CORRECTIONAL FACILITY
NEW YORK POLICE DEPARTMENT
EL PASO COUNTY SHERIFF
EL PASO POLICE DEPARTMENT
EL PASO COLLABORATIVE
DAN OLIVAS AND ASSOCIATES
LORAIN FRIAS individually and in official capacity
PATTI OLIVAS individually and in official capacity
EL PASO CONSTABLE
THE CITY OF EL PASO TEXAS
EL PASO COUNTY TEXAS
BEXAR COUNTY TEXAS
BEXAR COUNTY PROBATION OFFICER 1
BEXAR COUNTY PROBATION OFFICER 2
SAN ANTONIO TEXAS
UNITED STATES AIR FORCE
RANDOLPH AIRFORCE BASE
THE STATE OF ILLINOIS
THE CITY OF CHICAGO ILLINOIS
COOK COUNTY ILLINOIS
CHICAGO POLICE DEPARTMENT
COOK COUNTY ILLINOIS SHERIFF
CHICAGO PUBLIC SCHOOL DISTRICT
CHAMPAIGN COUNTY ILLINOIS
CHAMPAIGN ILLINOIS
URBANA ILLINOIS
JACKSONVILLE ILLINOIS
MORGAN COUNTY ILLINOIS
JACKSONVILLE POLICE DEPARTMENT
ILLINOIS SCHOOL DISTRICT 117
RANDY DUVENDACK individually and in official capacity
LAS CRUCES POLICE DEPARTMENT
DONA ANA COUNTY NEW MEXICO

DONA ANA COUNTY SHERIFF

DONA ANA COUNTY , NEW MEXICO

CITY OF LAS CRUCES

THE EL PASO TIMES

ASHLEY MARTINEZ individually and in official capacity

ALYSSA NAVA individually and in official capacity

JAIME ESPARZA individually and in official capacity

VICTOR PARA individually and in official capacity

DEREK QUINATA individually and in official capacity

STEPHANIE JAMES individually and in official capacity

JUSTIN UNDERWOOD individually and in official capacity

RICHARD BRUCE THARPE individually and in official capacity

THEOLA HAGGER individually and in official capacity

OUISA DAVIS individually and in official capacity

RAFAEL MORALES individually and in official capacity

SCOTT REID individually and in official capacity

MICHAEL SANTICOLA individually and in official capacity

MICHELLE SANTICOLA individually and in official capacity

DANA LEVINE individually and in official capacity

ALLEGHENY COUNTY

ALLEGHENY COUNTY DISTRICT ATTORNEY'S OFFICE

PITTSBURGH POLICE DEPARTMENT

ANGELA ZANE individually and in official capacity

DENISE DEMARCO individually and in official capacity

CORNELIUS STANLEY MUNGER individually and in official capacity

THE STATE OF PENNSYLVANIA

MOON TOWNSHIP

SAMUEL 'SAM' MEDRANO individually and in official capacity

LIONEL JEAN BAPTISTE individually and in official capacity

MICHAEL DELEON individually and in official capacity

MARY ROSER individually and in official capacity

MARY TREW individually and in official capacity

MARY MURRAY individually and in official capacity

ANGIE BARILL individually and in official capacity

JESUS RODRIGUEZ individually and in official capacity

JESUS URENDA individually and in official capacity

RANDALL ROSEMBAUM individually and in official capacity

LEROY EKECHUCKWU individually and in official capacity

MARCUS GRAY individually and in official capacity

BRENDEN DAVIS individually and in official capacity

JOHN BUCHMILLER AND ASSOCIATES

MARK LESKO individually and in official capacity

MARGOT GARANT individually and in official capacity

DORIS HUETT WILLIAMS individually and in official capacity

CURTIS D. SOUTH individually and in official capacity

OFFICER PAUL PAOLI EPPD #3155 individually and in official capacity

DETECTIVE CHARLES VERA EPPD #2883 individually and in official capacity
SGT. ROSALYN CARRASCO EPPD # 2317 individually and in official capacity
LT. ROBERT NIETO EPPD #1828 individually and in official capacity
DETECTIVE RAUL RIVERA EPCSO #1373 individually and in official capacity
DETECTIVE DELMA VELIZ EPCSO #1178 individually and in official capacity
DETECTIVE JOSE DE LA O EPCSP#4917 individually and in official capacity
DEPUTY PEDRO MORENO EPCSO #2975 individually and in official capacity
DEPUTY SAMUEL MAGALLANES EPCSO #4916 individually and in official capacity
SGT. NOE JUAREZ EPCSO #7648 individually and in official capacity
SGT. ROBERT MCCORD LAS CRUCES PD individually and in official capacity
DETECTIVE GREG MILLER SUFFOK COUNTY PD #1049 individually and in official capacity
JULIETTA ARREDONDO individually and in official capacity
JACOB CHESTER WILLIAMS individually and in official capacity
DEPUTY REYMUNDO MUNOZ EPCSO #5431 individually and in official capacity
PRISION TRANSPORT SYSTEMS
THE STATE OF TEXAS
THE CITY OF EL PASO, TEXAS
VERONICA LERMA individually and in official capacity
RICHARD ROMAN individually and in official capacity
OUIA DAVIS individually and in official capacity
RAFAEL MORALES individually and in official capacity
SHANE O'NEAL individually and in official capacity
THE UNITED STATES OFFICE OF CONGRESS
ROBERT FRANCIS O'ROURKE individually and in official capacity
BENITO TORRES individually and in official capacity
FORT BLISS
THE UNITED STATES ARMY
OFFICE OF THE INSPECTOR GENERAL
ROBERT "PAT" WHITE individually and in official capacity
THE DEPARTMENT OF DEFENSE
WILLIAM BEAUMONT ARMY MEDICAL CENTER
QURANA VEDDY individually and in official capacity
CARREY CURRAN individually and in official capacity
CARLE HOSPITAL
PROVIDENCE HOSPITAL
NEW YORK LEGAL ASSISTANCE GROUP
TEXAS ADVOCACY PROJECT
RICHARD ROUNTREE individually and in official capacity
ALISON NEAL individually and in official capacity
TEXAS RIO GRANDE LEGAL ASSISTANCE GROUP
ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES
TEXAS DEPARTMENT OF CHILDREN AND FAMILY SERVICES
INKEKE AALDERTS individually and in official capacity
ERIC ADAMS individually and in official capacity
LORI LIGHTFOOT individually and in official capacity
DEE MARGO individually and in official capacity

BILL DEBLASSIO individually and in official capacity
CITY OF ORLANDO
ORLANDO POLICE DEPARTMENT
ORANGE COUNTY FLORIDA
ORANGE COUNTY SHERIFF
WILLIAM DEMOTT individually and in official capacity
MIKE KNOX individually and in official capacity
SHANNON SPURILL individually and in official capacity
MICHELLE LYNCH individually and in official capacity
MECHELLE BAILEY individually and in official capacity
EPHRAM SIMS individually and in official capacity
XAVIER FULTON individually and in official capacity
GLEN FULTON individually and in official capacity
DORIS HUETT WILLIAMS individually and in official capacity
PAULA WHITE-CAIN individually and in official capacity
T.D. JAKES individually and in official capacity
EDWARD MCGEE individually and in official capacity
TIMOTHY MCGILL individually and in official capacity
TIM DELINA individually and in official capacity
CARTER CONLON individually and in official capacity
TIMES SQUARE CHURCH
ISAAC WRIGHT JR. individually and in official capacity
LARRY LAWRENCE individually and in official capacity
NORRIS LAWRENCE individually and in official capacity
STACEY LAWRENCE
CHRIS LAWRENCE
SANDRA LAWRENCE
ROSEMARY LAWRENCE
SHAMEKA LAWRENCE
LARRY WILSON
CRAIG WRIGHT individually and in official capacity
ALFREDO ALDERETE individually and in official capacity
KIA STEVENS
HOPE ELAM
JOEL ELAM individually and in official capacity
MELINDA ELAM
ROSHEEMA DIXON
WORLD WRESTLING ENTERTAINMENT
IMPACT WRESTLING
NATIONAL WRESTLING ALLIANCE
BILLY CORGAN
JEFF JARRETT
KAREN JARRETT
JOHN LAURINAITIS
DEEP SOUTH WRESTLING
ALL ELITE WRESTLING

TONY KHAN
GLENN JACOBS individually and in official capacity
SHAD KHAN individually and in official capacity
KRISTAL MARSHALL individually and in official capacity
THOMAS LAUGHLIN
MARK CARRANO
RICHARD HENRY BLOOD SR
PAUL HEYMAN
LUCHA LIBRE U.S.A
MTV NETWORKS
VERONICA SALINAS
STEVE SHIPP
ALEX ABRAHANTES
MEGAN PACHECCO individually and in official capacity
KERI COATES
BEN STROUD
TODD KRESS individually and in official capacity
FLORIDA STATE UNIVERSITY
UNIVERSITY OF SOUTH FLORIDA
COLLEGE OF SOUTHERN IDAHO
UNIVERSITY OF TEXAS AUSTIN
VINCENT PAWOLOWSKI individually and in official capacity
JOHN BREWER
DAVE HAWK
GUADELUPE RIVERA individually and in official capacity
EVAN CAMPBELL
JOHN ROBINSON individually and in official capacity
TROY BROWN individually and in official capacity
ROY HARRIS individually and in official capacity
STAN BERNSTEIN individually and in official capacity
SHANE O'NEAL individually and in official capacity
MILESTONE MANAGEMENT
JORDAN PETRAS
TAMPA POLICE DEPARTMENT
CITY OF TAMPA
HILLSBOROUGH COUNTY FLORIDA
PETULAH MARCIA WILSON
KIA STEVENS individually and in official capacity
PRISON TRANSPORT SYSTEMS OFFICER 1
PRISON TRANSPORT SYSTEMS OFFICER 2
RICHARD WILES individually and in official capacity
RICHARD ARABIGT individually and in official capacity
RICHARD ROMAN individually and in official capacity
ASHLEY MEYER individually and in official capacity
ASHLEY FULTON
THERESA OF EL PASO COLLABORATIVE

INTEGRITY ASSET MANAGEMENT

CAREY CURRAN individually and in official capacity

MICHAEL BARNES individually and in official capacity

MARK SPINN individually and in official capacity

GABRIELLA REED individually and in official capacity

MARIO DIAZ #1744 individually and in official capacity

VERONICA ESCOBAR individually and in official capacity

THE YWCA

FRANCESCA AMATO

ALICIA JACKSON

YAHARA GUTIERREZ individually and in official capacity

THEOLA HAGGER individually and in official capacity

RUTH REYES individually and in official capacity

CONSTABLE 1 individually and in official capacity

CONSTABLE 2 individually and in official capacity

FRANCES PIERRE individually and in official capacity

BILL HICKS individually and in official capacity

SHELDON JACKLER

PENGP PING JACKLER

EDUARDO LERMA JR. individually and in official capacity

EDUARDO LERMA SR. individually and in official capacity

RIKERS ISLAND

HENRY MULHEIM individually and in official capacity

JARED COHEN individually and in official capacity

CHRISTINA COCORAN individually and in official capacity

PHILLIP KATZ individually and in official capacity

MICHELLE ROBERTS individually and in official capacity

NEIGHBORHOOD DEFENDER SERVICES OF HARLEM

YVONNE ROSALES individually and in official capacity

SHIRLEY POLICE OFFICER 1 individually and in official capacity

SHIRLEY POLICE OFFICER 2 individually and in official capacity

UNITED STATES MARSHAL 1 individually and in official capacity

NYPD OFFICER 1 individually and in official capacity

NYPD OFFICER 2 individually and in official capacity

NYPD OFFICER 3 individually and in official capacity

JENNIPHER ADKINS

DEPUTY 1 individually and in official capacity

DEPUTY 2 individually and in official capacity

CYNTHIA HURST individually and in official capacity

ED WAINSCOTT individually and in official capacity

SANDRA WRIGHT

TIKEALLA WRIGHT

ISAAC WRIGHT JR. individually and in official capacity

GENA ONLEY individually and in official capacity

CLINT DEAS

DIANA WASHINGTON HUETT

PAULA WHITE CAIN
ARYN WILLIAMS VANN individually and in official capacity
CHICAGO LEGAL AID
KAREN SMEDLEY
MIKALEA TRAMMELL
BRITTNAY FULTON
GLADYS MATTHEWS
BRITTNAY WINES
FELYSHA MONDRAGON individually and in official capacity
JODI REBER
NATALIE KATHERINE NEIDHART
LOLITA NEWMAN
EL PASO MOTHERS AGAINST FAMILY COURT ABUSE
COUNTY COURT AT LAW 5
4409TH DISTRICT COURT
65TH DISTRICT COURT
MEGAN PACHECCO
JOHNNIE COCHRAN individually and in official capacity
LYNWOOD POLICE DEPARTMENT
LYNWOOD ILLINOIS
LYNWOOD ELEMENTARY
CITY OF MCDONOUGH, GEORGIA
HENRY COUNTY
MCDONOUGH POLICE DEPARTMENT
HENRY COUNTY JUDGE 1 individually and in official capacity
HENRY COUNTY PROSECUTOR 1 individually and in official capacity
STATE OF GEORGIA
MATTHEW PEZZULLO individually and in official capacity
MATTHEW HAGEE individually and in official capacity
DEAN MALENKO
THE ROOSEVELT HOTEL
PAKISTAN INTERNATIONAL AIRLINES
KINDER CARE
CIRCLE C RANCH
COLLEGE CLUB APARTMENTS
PANDA ENERGY
CENTER AGAINST SEXUAL AND FAMILY VIOLENCE
AISHA CARR
DOMINIQUE KELSIE
AUSTIN HAGEE individually and in official capacity
SHAD KHAN
WINDY LAURA WILLIAMS
FACEBOOK
TWITTER
INSTAGRAM
GOOGLE

YAHOO
OMAR BENSON MILLER individually and in official capacity
JABARI MCINTYRE
LARRY SAMPLE
SUE SINCLAIR
EL PASO INDEPENDENT SCHOOL DISTRICT
ANTHONY CORONA
MIKE MIZANIN
LAUREN WILLIAMS
ALBERTA AMOATEG
RAQUEL TOLMARIE
TERRY TAYLOR
BOOKER T HUFFMAN
SHARMELL SULIVAN HUFFMAN
THE REALITY OF WRESTLING
THE NEW YORK POST
RICHARD MCDANIEL
RAMIRO PANDO
EMPIRE BLUE CROSS BLUE SHEILD
BLUE CROSS BLUE SHEILD OF TEXAS
MEDICAID
TRICARE
CIGNA
JAMES SHEPHERD individually and in official capacity
TAMPA GENERAL HOSPITAL
CORINTHIAN COLLEGES
ANITA LAWSON
PICASSO MICKENS
JEREMY BELL
TYLER PERRY
THE ASSOCIATED PRESS
CINDY FRELUND
RANDY WHITE
DELEON RICHARDS SHEFFIELD
JOEL OSTEEN
LAKEWOOD CHURCH
MONTY KIP SOPP
GAIL KIM
KATHY COLACE
SYNOGOGUE CHURCH OF ALL NATIONS
LAGOS STATE
NEUROPSYCHIATRIC INSTITUTE
CHASE BANK
USAA
FLYING J
HSN

ABM MANAGEMENT
ERIKA BRYAN
GREYSTAR
ASHLEY HOLT
DON HARDIN
THERESA GRENTZ
STAMFORD HOUSING AUTHORITY
KRISTAL KLAFKA
SHANTEL TERRY
TONY PETRUZZI
POWERHOUSE GYM
SHELLY MARTINEZ
CHAVO GURRERO
MAEK ROBERT JINDRAK
SAFE HORIZONS
SCOTT RECHSTEINER
GIOVANNA YANOTTI
LETITIA JAMES individually and in official capacity
MICHAEL WILLIAMS individually and in official capacity
CHRISTOPHER CROSS individually and in official capacity
WYNDHAM HOTELS
RAMADA
PNC BANK
KENDREA MEYER
CITY OF ORLANDO
ORLANDO POLICE DEPARTMENT
ORANGE COUNTY SHERIFF
FELIX VALENZUELA
SAUL AMINDARIZ
THOMAS COE
JAMES PATRICK individually and in official capacity
AILENE ROBINSON individually and in official capacity
ARMY CRIMINAL INVESTIGATION DIVISION
STAMFORD POLICE DEPARTMENT
CITY OF STAMFORD
MICHELLE WRIGHT
PRISON DOE 1-10
JAIL DOE 1-10
CANNON CITY FAMILY CRISIS CENTER
THE BRIDGE OVER TROUBLED WATERS INC
HOUSTON AREA WOMENS SHELTER
REYNOLDS HOUSE
JOHN DOE 1-100
JANE DOE 1-100

PLAINTIFFS' 2nd AMENDED COMPLAINT

I. RULE 8 PRELIMINARY STATEMENT

1. This is an action is a Federal Civil Rights complaint being brought by the Plaintiffs under 42 U.S.C. § 1983, 42 U.S.C. § 1982, 42 U.S.C. § 1985, 42 U.S.C. § 1986, 42 U.S.C. § 1988, 18 U.S.C. § 2261, 18 U.S.C. § 1201 , 18 U.S.C 373, 19 U.S.C. 552 and the laws of the State of New York. This action arises out of the unlawful acts of the above captioned Defendants as they collectively conspired and devised a scheme to interfere with and deprive the Plaintiffs of their civil rights under the color of law. The Plaintiffs are also seeking damages pursuant to the Adult Survivor Act (S.66A/A.648A). The Plaintiffs bring this suit against the captioned Defendants individually and in their official capacities. This suit has been brought forth in response to the named Defendants' individual and collective unlawful violations of Plaintiffs constitutional rights. Each of the Defendants named in this complaint acted collectively as they conspired to deprive BIGGERS, M.F., and Z.S. of their civil rights under the color of law. The Defendants committed these unlawful violations of Plaintiff's constitutional and state rights in bad faith and intentionally acted with malicious purpose. The Defendants likewise acted in reckless, wanton, and willful disregard of Plaintiff's human safety and property rights as United States law enforcement agencies were weaponized against the Plaintiffs.
2. BIGGERS' former roommate SDNY Judge **LAURA TAYLOR SWAIN** and each Defendant named in the entirety of this Complaint collectively conspired to interfere with the Plaintiffs civil rights and to deprive the Plaintiffs of their civil rights under the color of law by kidnapping Plaintiff Trenesha Biggers and her children including co-Plaintiffs M.F. and Z.S. The conspiracy to interfere with and to deprive the Plaintiff's of their Civil Rights spanned across multiple states including New Mexico, Illinois, Florida , Texas, Pennsylvania , and New York. The Defendants have constructed a multi-headed intricate criminal enterprise that has infiltrated numerous government agencies, government entities, organizations, and corporations. Each Defendant named in this action collectively conspired to participate in the conspiracy to stalk, rape, molest, mutilate, burglarize, sex traffic, kidnap, falsely arrest and falsely imprison the Plaintiffs, and then to conceal their crimes. The unlawful attack against the Plaintiffs persons and property has been continuous and is occurring simultaneously as the Plaintiffs bring this action. The Plaintiffs have suffered physical injury, emotional injury, and irreparable harm.
3. The acts of kidnapping, rape, physical abuse, domestic violence, stalking, and subsequent slander has subjected the Plaintiffs to continuous severe physical injury, emotional injury, trauma, significant pain and suffering, loss of dignity, and a gross invasion of their privacy.

BIGGERS has filed this suit for herself and on behalf of her children M.F., and Z.S. in order to obtain redress for the injuries that they have suffered. Likewise, it was necessary to file this suit to force the criminal enterprise to cease their ongoing acts of violence, stalking and the continuous audacious deprivation of the civil rights. For the sake of Justice, this suit is necessary to dismantle the Defendants corrupt criminal enterprise and bring their reign of domestic terrorism on United States soil and around the world to naught. Therefore, this lawsuit it necessary to bring the continuous injury to and end and to clearly establish that in the United States of America; organized crime does not pay, and that no one is above the law.

4. Pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1982, 42 U.S.C. § 1985, 42 U.S.C. § 1986, 42 U.S.C. § 1988, 18 U.S.C. § 2261, 18 U.S.C. § 1201 , 18 U.S.C 373, 19 U.S.C. 552 and the laws of the State of New York;

Plaintiffs Trenesha Biggers, M.F. a child and Z.S. a child seek declaratory relief, injunctive relief, and monetary damages to bring an end to the continuous violations of their civil rights under the color of law.

JURY DEMAND

5. Plaintiffs hereby demand a trial by Jury.

II. JURISDICTION AND VENUE

6. This is an action is a Federal Civil Rights complaint being brought by the Plaintiffs under 42 U.S.C. § 1983, 42 U.S.C. § 1982, 42 U.S.C. § 1985, 42 U.S.C. § 1986, 42 U.S.C. § 1988, 18 U.S.C. § 2261, 18 U.S.C. § 1201 , 18 U.S.C 373, 19 U.S.C. 552 and the laws of the State of New York.
7. This Court has jurisdiction over this action pursuant 42 U.S.C. § 1983 , 42 U.S.C 1985, 42 U.S.C. 1986 and for violations of civil rights under the First, Fourth, and Fourteenth Amendments to the United States Constitution and New York State Law.
8. This Court has subject-matter jurisdiction over Plaintiffs' federal claims in this matter pursuant to 28 U.S.C. § 1331.
9. 28 U.S.C. § 1367 provides this Court with supplemental jurisdiction over the state law tort claims that arose from the same common nuclei of facts.
10. This Court has jurisdiction over this action pursuant to 28 U.S.C § 1332 because the parties are residents of different states and the amount in controversy exceeds \$75,000.
11. Venue is proper according to 28 USC 1391(b)(1) and (2) because multiple named Defendants reside in this district, and a substantial part of the events giving rise to this action occurred in this judicial district.
12. Defendants' independent and collective malicious and unlawful violations under color of state law of Plaintiff's constitutional rights have given rise to the claims herein accrued within this district and division.

III. THE PARTIES

13. Plaintiff Trenesha Biggers is a resident of New York City, New York.
14. Plaintiff M.F., a child, was kidnapped in the State of New York
15. Plaintiff Z.S., a child, was kidnapped in the State of New York
16. Defendant LAURA TAYLOR SWAIN is a resident of New York City, New York
17. MARY TREW is a Judge in Cook County, Illinois
18. MICHAEL SANTICOLA was the ALLEGHENY COUNTY SOLICITOR
19. THE FBI is a federal law enforcement agency
20. FORT BLISS is an ARMY INSTILLATION IN Fort Bliss ,Texas
21. THE MANHATTAN FAMILY JUSTICE CENTER is an organization located in New York City, New York
22. THE NEW YORK DIVISION OF HUMAN RIGHTS is an organization located in New York City, New York
23. NYPD OFFICER 1, NYPD OFFICER 2, and NYPD OFFICER 3 are police officers with the NEW YORK POLICE DEPARTMENT
24. CHARLES VERA is a detective for the New York Police Department
25. SGT ROBERT MCCORD is a Deputy for the Dona Ana County Sheriff in New Mexico
26. Defendant PHILLIP KATZ is a court appointed attorney New York City, New York.
27. Defendant CHRISTINA CORCRAN is a court appointed New York City, New York.

28. Defendant MICHELLE ROBERTS a court appointed attorney in New York City, New York
29. Defendant LAUREN ANGELO is a New York County Defender in New York City
30. Defendant CHARANYA VISWANATHAN is a New York County Defender is New York City
31. Defendant ROBIN MCCABE is a New York County Defender in New York City
32. Defendant CHRISTINA KANSO is a New York County Defender in New York City
33. Defendant ELIZABETH RAIMOND is a New York County Defender in New York City
34. VERONICA LERMA is a court appointed attorney in El Paso Texas
35. PRISON TRANSPORT SYSTEMS is a company located in Nashville , Tennessee
36. Defendant ANGIE BARILL is a Judge in El Paso , Texas
37. Defendant ALYSSA NAVA was a District Attorney in El Paso ,Texas
38. Defendant ASHLEY MARTINEZ is a District Attorney in Paso ,Texas
39. Defendant SAMUEL 'SAM' MEDRANO is Judge in El Paso, Texas
40. Defendant MICHAEL DELEON is a Judge in San Antonio, Texas
41. Each of the other named Defendants in this Complaint are individuals and corporations located in the State of New York ,various other territories, and various other States.

IV. BACKGROUND

42. The conspiracy to interfere with the Plaintiffs civil rights began in or about the month of August 2003 when Southern District of New York Judge LAURA TAYLOR SWAIN, or "SWAIN", and Plaintiff TRENESHA BIGGERS, "BIGGERS", were roommates. BIGGERS a young teenager, was enrolled at Florida State University. SWAIN was well into her 40's posing as a college student and living in student housing to stalk BIGGERS as well as to sabotage BIGGERS educational and professional endeavors. SWAIN began dating BIGGERS boyfriend while they both still resided in the same apartment. BIGGERS filed this action in the Southern District Court of New York on October 8th 2021. Almost immediately, SWAIN then appointed herself or was appointed to preside over BIGGERS case. LAURA TAYLOR SWAIN has the intent to obstruct justice as well as aid and abet the other Defendants named in this case in their criminal acts their efforts to conspire to interfere with the Plaintiffs civil rights. BIGGERS filed a Motion to Recuse SWAIN from this action based on their prior relationship as roommates. Additionally, SWAIN and BIGGERS have a past contentious relationship due to SWAIN continuously dating BIGGERS boyfriends while and after they were roommates. SWAIN did not allow another Judge to hear the Motion for her recusal, denied the Motion to Recuse, and knowingly and intentionally lied as she claimed that her and BIGGERS never lived together. As detailed further below, SWAIN continued her acts of Fraud upon the Court as she ordered and or allowed the SDNY Pro Se Intake Unit to alter and delete docket entries that contained the names of BIGGERS kidnapped children. The SDNY Pro Se Intake Unit has also fraudulently handled BIGGERS pro se case on behalf of SWAIN by making it difficult for BIGGERS to file documents into this case. Additionally, SWAIN has blatantly and audaciously committed the high misdemeanor of practicing law from the bench as she is clearly acting as an attorney for her co-defendants and the co-conspirators named in this action.
43. On October 8th 2016 BIGGERS was brutally attacked as she was beaten unconscious and raped by EPHRAM SIMS on Randolph Airforce Base. The photos below shows the physical injury EPHRAM SIMS inflicted upon BIGGERS.



- 44.
45. EPHRAM SIMS took a plea deal for the attack and was convicted. However SIM'S BEXAR COUNTY probation officers, THE UNITED STATES ARMY, THE EL PASO POLICE DEPARTMENT, THE NEW YORK POLICE DEPARTMENT, and THE SHIRLEY NEW YORK POLICE DEPARTMENT allowed SIMS to continue to stalk, hunt, and kidnap his victims from El Paso Texas to New York.
46. SIMS also took to social media and proclaimed himself to be the victim, denied attacking BIGGERS, and was supported by the United States ARMY as he did so.
47. BIGGERS filed official complaints with the ARMY OFFICE OF THE INSPECTOR GENERAL. Although SIMS plead guilty to and was convicted of the assault, the DEPARTMENT OF DEFENSE and the INSPECTOR GENERAL claimed that BIGGERS allegations of abuse at the hands of their soldier were "unsubstantiated". This assertion was in direct opposition to SIMS admission and his criminal conviction for the assault. After BIGGERS complaint to the Pentagon ARMY INSPECTOR GENERAL was swept under the rug, it began to become apparent that the cover-up for the crimes was coming from the highest seat in the land; the office of the United States President.
48. BIGGERS filed a formal congressional inquiry about the crimes with UNITED STATES CONGRESSMAN ROBERT O'ROURKE. BIGGERS also contacted O'ROURKE'S office when SIMS, KURT ANGLE, and XAVIER FULTON began chasing her and her children across the country as they prepared to kidnap them from New York .
49. BENITO TORRES of Congressman O'ROURKE'S office answered BIGGERS call for help from a Colorado domestic violence shelter. BENITO informed BIGGERS that his office would be assisting the terrorist organization in kidnapping her and her children. The UNITED STATES OFFICE OF CONGRESS followed through with that threat.

50. SIMS was allowed by UNITED STATES CONGRESSMAN ROBERT O'ROURKE, THE DEPARTMENT OF DEFENSE, NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES, and the NYPD to violate protective orders and criminal no-contact orders in place for the Plaintiffs.

51. In September of 2019, SIMS and KURT ANGLE made a "WANTED" poster of BIGGERS and her children while she was the listed victim in his criminal case. At this time SIMS was still banned from any contact with BIGGERS and her children by the criminal courts. There is no evidence that BIGGERS was wanted for any crime before or after SIMS made the poster. After SIMS made his fictitious "Wanted" poster, the Plaintiffs obtained additional Orders of Protection and fled for their lives to New York City October of 2019. Below is the Wanted Poster that SIMS circulated.



52.

53. The criminal enterprise blurred out RICHARD BRUCE THARPES'S face in this photo. The photo was taken after THARPE appeared pretending to represent BIGGERS in her family Court case. THARPE was sent by the criminal enterprise to have BIGGERS falsely imprisoned and to kidnap M.F. and Z.S.

54. Detective CHARLES VERA of the EL PASO POLICE DEPARTMENT also contacted BIGGERS in violation of probation SIMS terms of no-contact. VERA called BIGGERS on her cell phone then knowingly and intentionally lied stating that he had secured a warrant for her arrest. The truth in fact was that VERA attempted to assist the criminal enterprise by securing a warrant for BIGGERS arrest, however the Judge did not find merit to his allegations and no Judge signed any warrant for BIGGERS arrest. To this day, no valid arrest warrant exists for Custodial Interference or for Aggravated Kidnapping as the STATE OF TEXAS alleges. Below is a copy of VERA'S failed attempt to secure an arrest warrant. As pictured below, no Judge signed the warrant. Therefore the warrant does not exist.

SUPPLEMENTAL REPORT		
Agency: <i>EPPD</i>	OCA 19113199	
THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY		
Investigator: <i>Vera, Charles D 191960</i>	Date / Time: <i>07/22/2019 15:19:58</i>	<i>Monday</i>
Contact:	Reference: <i>AFFIDAVIT SUPPLEMENT</i>	
COMPLAINT AFFIDAVIT EL PASO COUNTY, TEXAS		
THE STATE OF TEXAS COUNTY OF EL PASO		COURT NO. <i>119000670</i>
Filing Agency: El Paso Police Department		
Offense Report #: 19-113199		
Date of offense: <i>03/09/2018-04/23/2019</i>	Time of offense: 0000-2359	
Defendant Name: <i>Trenesha Sims</i>	Defendant date of birth: <i>12/26/1981</i>	
Offense: <i>Interference with Child Custody</i>	Offense Code# <i>38990036</i>	
<p>IN THE NAME AND AUTHORITY OF THE STATE OF TEXAS BEFORE ME, the undersigned authority, on this day personally appeared C. Vera #2883, who after being by me duly sworn, on oath deposes and says that he has good reason to believe and does believe that heretofore to wit: on or about the 9th day of March 2018 and before the filing of this complaint in the County of El Paso, the State of Texas, one Trenesha Sims, Hereinafter called the DEFENDANT, did then and there unlawfully, retain a child younger than 18 years of age, when the person knows that the person's taking or retention violates the express terms of a judgment or order, including a temporary order, of a court disposing of the child's custody to-wit; Defendant has violated the Court order (cause # 2016DCM7851 from the 65th Judicial District Court) by retaining the child-Sims and not giving C/W custodial custody</p> <p>P.C.</p> <p>On 04/23/2019, Officer P. Paoli #3155 working as unit 2S300 was working the desk at CRCC when C/W walked in requesting to make a report. C/W advised that as of the date on his divorce decree, Defendant has not given him custody of Child-Sims (3 year old daughter) as he is the sole conservator of the child. C/W has attempted to reach Defendant via phone call and text message but has received no response.</p> <p>C/W advised that on 04/09/2019, his divorce from Defendant was finalized and he was supposed to retain custody of Child-Sims as per the court order. C/W further advised that on that date, Defendant fled the court house and has avoided C/W and will not release Child-Sims into his custody. C/W presented a valid court document that detailed him to be the sole conservator of the child. C/W advised that Defendant has never complied with custody orders and constantly keeps his daughter from him.</p>		
<i>R_Supp3</i>	Page 1 of 2	

SUPPLEMENTAL REPORT

Agency: EPPD

OCA 19113199

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Officer Paoli reviewed the paperwork C/W presented and found it to be a legitimate court document bearing the cause number of 2016DCM7851, which was signed in the 65th Judicial District Court signed by Judge Gutierrez. Officer Paoli was able to read the paperwork and determine that Defendant is in violation of the order by not adhering the to the scheduled visitations. Officer Paoli was also able to read that C/W is in fact the sole conservator and decision maker for Child-Sims.

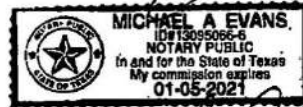
Detective C. Vera #2883 met with C/W who provided copies of all documentation and Det. Vera was able to look up the extensive history of reports made by C/W against Defendant for the many times Defendant has violated the court order. C/W has made over 50 reports of Defendant violating the custody order.

This offense occurred in the City and County of El Paso, Texas

Against the peace and dignity of the State.

Sworn to and subscribed before me on this, the

24 day of July, 2019



Affiant

Notary Public in and for El Paso County, Texas

Sworn to and subscribed before me, and filed in this court, this the _____ day of _____, 20____
Probable Cause for issuance of Warrant found.

Judge,

District Court
County Court at Law#
Of El Paso County, Texas

Judge,

El Paso Municipal Court #
El Paso Justice Ct. Pct #
EL Paso Criminal Law Magistrate of
El Paso County, Texas

R_Supp3

Page 2 of 2

56.

57. Ultimately, on October 8 2019 the criminal enterprise was successful in kidnapping BIGGERS, M.F., and Z.S. from BRIGHTER TOMORROWS domestic violence shelter in Shirley New York by the SHIRLEY POLICE DEPARTMENT and detective GREG MILLER. The NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES along with TEXAS CHILD PROTECTIVE SERVICES also participated in the kidnapping of BIGGERS children as they acted without any Court order in direct violation of BIGGERS custody and protective orders.

IN THE COUNTY COURT 7 OF BEXAR COUNTY, TEXAS
 THE STATE OF TEXAS
 VS.
 EPHRAIM SIMS
 FILED IN MY OFFICE
 LUCY ADAME-CLARK
 COUNTY CLERK BEXAR CO
 2019 APR -4 PM 3:05
 NO. 595982
 OFFENSE: ASSAULT BODILY INJURY-
 FAMILY/HOUSEHOLD
 TERMS AND CONDITIONS OF COMMUNITY SUPERVISION
 DEFERRED ADJUDICATION

On 3rd day of April, 2019, you were placed on community supervision for a period of 1 Year with the following terms and conditions as denoted below by (x) in left margin:

- *****
- [X] 1. Neither commit nor be convicted of any offense against the Laws of the State of Texas; or any other State or of the United States of America.
 - [X] 2. Avoid injurious or vicious habits and abstain from the illegal use of controlled substances, dangerous drugs, nor use alcoholic beverages; submit to drug testing or as directed by the Court/Court Officer/Supervision Officer and pay a one time urinalysis fee of \$20.00 ninety (90) days after being granted community supervision. An additional fee per urinalysis test will be charged by the Provider conducting the test.
 - [X] 3. Avoid places and persons of harmful or disreputable character, including those who engage in criminal activity or have a criminal record.
 - [X] 4. Obtain and keep gainful employment in a lawful occupation and show proof of employment. Notify the Supervision Officer of any changes within 48 hours. You will tender any and all financial documents as directed by the Court and/or the Supervision Officer.
 - [X] 5. Beginning April 3, 2019 report to the Supervision Officer as directed by the Court/Supervision Officer and obey all rules and regulations of the Community Supervision and Corrections Department. You will conduct yourself in a proper and orderly manner during any office visit, field visit, or any other contact with any Supervision Officer or employee of the Bexar County Community Supervision and Corrections Department.
 - [X] 6. A. Permit the Supervision Officer, or his Assistants, to transport you as needed in Bexar County and to visit you in your home or elsewhere.
 B. You are subject to possible search of your person, residence or any vehicle, which you operate, occupy or possess at any time by any Supervision Officer, without prior notice or search warrant, to determine if you are in compliance with the conditions of community supervision. Any contraband found to be in your possession will be subject to confiscation and ultimately destroyed.
 C. You shall not possess any contraband in your home, vehicle, or on your person, including, but not limited to: prohibited or illegal weapons, controlled substances or illegal drugs, pornographic materials and obscene devices.
 - [X] 7. Remain within Bexar County, Texas, unless permitted in writing to depart by the Court and/or by the Supervision Officer.
 - [X] 8. Support your dependents.
 - [X] 9. A. Provide proof of residence and report any change of address to the Supervision Officer within 48 hours.
 B. If you are arrested notify the Supervision Officer within 48 hours. If you are released from jail report to the Supervision Officer the next working day.
 - [X] 10. Pay the following, in one or several sums, through the Bexar County Community Supervision and Corrections Department, and/or Bexar County Collections Section as directed by the payment plan agreement and in any sum that the Court shall determine during the term of your community supervision until all fees have been paid in full.

MANDATORY FEES:

- ☒ A. ADMINISTRATIVE SUPERVISORY FEE of \$60.00 per month, each month, beginning 05/01/19.
- ☐ B. IF AFTER A HEARING THE COURT DETERMINES YOU HAVE THE ABILITY TO PAY, COURT APPOINTED ATTORNEY FEE in the amount of \$_____ assessed by the Court, calculated into a monthly payment schedule, and subject to increase with a new payment schedule based on subsequent court appearances related to this case.
- ☐ C. IF ON PROBATION FOR SEX OFFENSE SPECIFIED IN STATUTE, SEXUAL ASSAULT PROGRAM FEE of \$5.00 per month, under Texas CCP Chapter 42.12 Sec 19(e) sixty days after the granting of community supervision, beginning _____.
- ☒ D. IF COURT DETERMINES OFFENSE INVOLVES FAMILY VIOLENCE, FAMILY VIOLENCE SHELTER FEE of \$50 to a family violence center that receives state or federal funds that serves Bexar County, including but not limited to the BATTERED WOMEN'S SHELTER, payable by _____.

PERMISSIVE FEES:


- ☒ E. COURT COSTS/FINE paid in accordance with the Bill of Cost, beginning 05/01/19.
- ☐ F. RESTITUTION of \$_____, beginning _____.
- ☐ G. IF SEX OFFENDER, SEX OFFENDER PUBLICATION FEE of \$105.00 payable 90 days from publication date. Such amount will be paid each and every time a change of address is made.
- ☐ H. CHILD ADVOCACY CENTER FEE in a one time payment of \$50.00, payable by _____.
- ☐ I. CRIME STOPPERS PROGRAM FEE in a one time payment of \$_____, payable by _____.
- [X] 11. You shall not unlawfully purchase, receive possess, or transport any weapon, including but not limited to: a club, explosive weapon, firearm, ammunition, illegal knife, martial arts weapon, brass knuckles, or chemical dispensing device during your term of community supervision.
- [X] 12. EXTRADITION: You will waive extradition to the State of Texas from any jurisdiction in or outside the United States where you may be found and also agree that you will not contest any effort by any jurisdiction to return you to the State of Texas.
- [X] 13. You shall not operate a motor vehicle without a valid Texas Driver's License.

Page 1
August 2019 Edition

EXHIBIT B

NAME: Ephram Sims NO.: 595982


- [X]14. Perform 40.00 hours of Community Service Restitution, and provide proof as directed by the Court at the rate of 13.00 hours per month. You will fully comply with all rules, regulations, and instructions as directed by the head or authorized personnel of that Agency.
- [X]15. Within 10 days of 04/03/19, you will enroll in a State accredited Battering Intervention and Prevention Program - see attached list. Attend, successfully complete and provide verification of completion to your supervision officer.
- [X]16. (Individual) No Contact General Order: You will neither contact nor attempt to contact Trenesha Biggers nor any of his/her family members in person, verbally, telephonically, in writing or in any other manner, and should you find yourself inadvertently in contact with said individual, you will immediately leave and not threaten, assault, or verbally abuse him/her.
- [X]17. Permission to Transfer: Reside at address: 13681 LARTINGTON ST, City: EL PASO, State: TX, County: EL PASO, and not depart said County without the written permission from the court.


JUDGE PRESIDING
4.4.19
DATE

You are hereby advised that under the Laws of this State, the Court shall determine the Terms and Conditions of your Community Supervision and may at anytime during the period of your community supervision, alter or modify the terms and conditions of your community supervision. The Court, Also, Has The Authority, At Any Time During The Period Of Your Community Supervision, To Revoke Same For Violation Of Any Of The Conditions Of Your Community Supervision Set Out Above. The Court has placed you on community supervision, believing that if you sincerely try to obey and comply with the conditions of your community supervision, your attitude and conduct will improve to the benefit of the public and of yourself.

I acknowledge receipt of a copy of the Conditions of Community Supervision and attached addenda and fully understand same. Conditions And Gun Control Act Were Explained, Conditions Fingerprinted, And Signed. I Also Acknowledge That I Must Report In Person Whether Or Not I Have The Money For Fees.

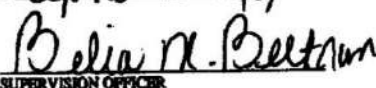
I acknowledge receipt of a copy of the Conditions of Community Supervision and fully understand same.


DEFENDANT'S SIGNATURE
A copy furnished to the above-named Defendant
and noted on the docket this 2 day
of April A.D. 2019

Address: 13681 Lartington St

City: El Paso State: Texas

Zip: 79928 Phone: 915-234-3107


SUPERVISION OFFICER
Bexar County Community Supervision and Corrections Department
207 N Comal, San Antonio, Texas 78207
(210) 335-7200

RIGHT THUMB PRINT



- 59.
- 60. Additionally, BIGGERS had a custody order and protective order in place against SIMS. The protective Order pictured below was presented to the SHIRLEY NEW YORK POLICE DEPARTMENT as well as the NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES as they kidnapped BIGGERS, M.F. and Z.S.

These agencies all showed a willful and deliberate indifference to the fact that these Court Orders of custody and protection for the Plaintiffs were in place.

ENDORSED COPY

4-963. Temporary order of protection and order to appear.
[Family Violence Protection Act, Sections 40-13-1 to 40-13-8 NMSA 1978.]

SEP -4 PM 2:30

STATE OF NEW MEXICO
COUNTY OF DONA ANA
THIRD JUDICIAL DISTRICT

TRENESHA BIGGERS, Petitioner

v.

No. DV-2019-514

EPHRAM SIMS, Respondent

**TEMPORARY ORDER OF PROTECTION
AND ORDER TO APPEAR**

The court has reviewed the sworn petition alleging domestic abuse. The court having considered the petition, **FINDS** that the court has jurisdiction and that there is probable cause to believe that an act of domestic abuse has occurred. The court **ORDERS**:

[X] 1. Respondent shall not write to, talk to, visit or contact the petitioner in any way except through petitioner's lawyer, if petitioner has a lawyer.

[X] 2. Respondent shall not abuse the petitioner or the petitioner's household members in any way. "Abuse" means any incident by respondent against petitioner or petitioner's household member resulting in (1) physical harm; (2) severe emotional distress; (3) bodily injury or assault; (4) a threat causing imminent fear of bodily injury; (5) criminal trespass; (6) criminal damage to property; (7) repeatedly driving by a residence or work place; (8) telephone harassment; (9) stalking; (10) harassment; (11) harm or threatened harm to children in any manner set forth above.

[X] 3. Respondent shall not ask or cause other persons to abuse the petitioner or the petitioner's household members.

[X] 4. Respondent shall not go within 100 yards of the petitioner's home or school or work place. Respondent shall not go within 100 yards of the petitioner at all times except respondent shall not go within 25 yards of petitioner. If at a public place, such as a store,

[X] 5. Trenesha Biggers (first and last name of party) shall have temporary physical custody of the following child(ren):

Child's Name	Date of Birth
<u>[REDACTED]</u>	<u>[REDACTED]</u>

[X] 6. With respect to the child(ren) named in the preceding paragraph, Ephram Sims (first and last name of parent) shall have:

1

EXHIBIT F

☒ A. No contact with the child(ren) until further order of this court and shall stay 100 yards away from the child(ren)'s school.

☐ B. Contact with the child(ren), subject to:

☒ 7. Neither party shall remove the child(ren) named in the preceding paragraph from the State of New Mexico or disenroll the child(ren) from the child(ren)'s present school during the period of this temporary order of protection.

☒ 8. The court may decide temporary child and interim support at the hearing listed below. Both parties shall bring to the hearing proof of income in the form of the two latest pay stubs or the federal tax returns from the previous year, proof of work related day-care costs and proof of medical insurance costs for the child(ren).

☐ 9.

☐ A. Respondent is ordered to immediately leave the residence at _____ and to not return until further court order.

☐ B. Law enforcement officers are hereby ordered to evict respondent from the residence at _____

☐ C. Respondent is ordered to surrender all keys to the residence to law enforcement officers.

☐ 10. Law enforcement officers or _____ shall accompany ☐ respondent ☐ petitioner to remove essential tools (as specified in No. 13), clothing, and personal belongings from the residence at _____

☒ 11. Neither party shall transfer, hide, add debt to, sell or otherwise dispose of the other's property or the joint property of the parties except in the usual course of business or for the necessities of life. The parties shall account to the court for all such changes to property made after the order is served or communicated to the party. Neither party shall disconnect the utilities of the other party's residence.

☐ 12. This order supersedes any inconsistent prior order in Cause No. _____ and any other prior domestic relations order and domestic violence restraining orders between these two parties.

☐ 13. Other: _____

☒ 14. While this order of protection is in effect, petitioner should refrain from any act that would cause the respondent to violate this order. This provision is not intended to and does not create a mutual order of protection. Under Section 40-13-6(D) NMSA 1978, only the restrained party can be arrested for violation of this order.

HEARING

IT IS FURTHER ORDERED that the parties shall appear in the Third Judicial District Court, Hearing Room #B, at 201 W. Picacho Avenue, Las Cruces, NM 88005, before the Domestic Violence Special Commissioner, at 8:15 a.m. on September 17, 2019 (date) for hearing on whether an extended order of protection against domestic abuse will be issued. Either party may bring witnesses or evidence and may be represented by counsel at this hearing. Respondent may file a Response to the Petition for Order of Protection from Domestic Abuse, see Form 4-962 NMRA, on or before the hearing. If the respondent fails to attend this hearing, an extended order may be entered by default against respondent and a bench warrant may be issued for respondent's arrest. If petitioner willfully fails to appear at this hearing, the petition may be dismissed. This order remains in force until September 17, 2019.

If an order of protection is entered, the restrained party is prohibited from receiving, transporting, or possessing a firearm or destructive device while the order of protection is in place. If at the hearing the court finds that the restrained party presents a credible threat to the physical safety of the protected party, the court shall order the restrained party (a) to immediately deliver any firearm in the restrained party's possession, care, custody, or control to a law enforcement agency, law enforcement officer, or federal firearms licensee while the order of protection is in effect, and (b) to refrain from purchasing, receiving, or possessing, or attempting to purchase, receive, or possess any firearm while the order of protection is in effect.

☒ **DO NOT BRING ANY CHILDREN TO THE HEARING WITHOUT PRIOR PERMISSION OF THE COURT.**

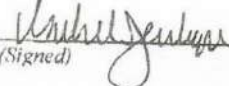
ENFORCEMENT OF ORDER

If the restrained party violates any part of this order, the restrained party may be charged with a crime, arrested, held in contempt of court, fined or jailed.

SERVICE AND NOTICE TO LAW ENFORCEMENT AGENCIES

Upon the signing of this order by a district court judge, a law enforcement officer shall serve on the respondent a copy of this order and a copy of the petition. A **LAW ENFORCEMENT OFFICER SHALL USE ANY LAWFUL MEANS TO ENFORCE THIS ORDER.**

☒ I have reviewed the petition for order of protection and made recommendations to the district judge regarding its disposition.



(Signed)

(575) 523-8200

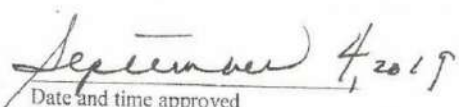
Court telephone number

Domestic Violence Special Commissioner
(Title)

SO ORDERED


District Judge

Date and time approved


September 4, 2019

USE NOTE

1. The temporary order of protection and order to appear requires a proof of return of service. The committee has been informed that each local law enforcement agency has its own return of service form, which will be used for this purpose.

2. Personal service of the temporary order of protection and order to appear will assure that the temporary order is fully enforceable. It is possible that actual notice to the respondent of the content of the temporary order will also suffice to bind the respondent to comply with the order. *Territory of New Mexico v. Clancy*, 7 N.M. 580, 583 (1894).

ENDORSED COPY

STATE OF NEW MEXICO
COUNTY OF DONA ANA
THIRD JUDICIAL DISTRICT COURT

FILED
2019 SEP 17 PM 4:30
JUDICIAL DISTRICT COURT
DONA ANA COUNTY, NM

Trenesha Biggers
Petitioner,

vs.

Ephraim Sims
Respondent.

No: DV- 2019-514

**ORDER RESCHEDULING HEARING AND EXTENSION OF
TEMPORARY RESTRAINING ORDER**

Upon information and belief, the Respondent was personally served with a Temporary Restraining Order and Order to Appear and Show Cause for a hearing before the Special Commissioner at the Third Judicial District Court, 201 W. Picacho Ave., Las Cruces, New Mexico on September 17, 2019 at 3:15 p.m. Petitioner has requested that the hearing be postponed and good cause appearing therefor;

It is ORDERED that the hearing previously set is vacated and re-scheduled for October 18, 2019 at 8:15 p.m. (Trailing Docket). The Petitioner and Respondent are required to appear for this hearing.

It is further ORDERED that the provisions of the Temporary Restraining Order and Order to Appear and Show Cause for the protection of the Petitioner and/or household members, previously issued by the Court, is extended through October 18, 2019.

[Signature]
Special Commissioner

Approved:

[Signature]
DISTRICT JUDGE

Certificate of Mailing

I certify that on Sept 17, 2019 I mailed a copy of the foregoing to Petitioner at address on file and to the Respondent at Ser by Det.

[Signature]
Domestic Violence Division Staff

64.

65. THE NYPD, THE SHIRLEY NEW YORK POLICE DEPARTMENT, EL PASO POLICE DEPARTMENT, THE MANHATTAN DISTRICT ATTORNEY'S OFFICE and THE EL PASO DISTRICT ATTORNEY'S OFFICE all knowingly and intentionally falsely asserted that they had a valid warrant for BIGGERS arrest, falsely imprisoned her, and ignored this custody and protective order.

warrant was used to kidnap BIGGERS by false arrest, falsely imprison her, extradite her from New York to El Paso, and to kidnap BIGGERS children. Furthermore, this arrest warrant is for “TRENESHA SIMS”. BIGGERS has never legally changed her name to “TRENESHA SIMS”. Even more absurd than these facts, the Court docket clearly reflects that BIGGERS was instantly indicted for aggravated kidnapping and interference with child custody when BIGGERS was the only legal custodian of Z.S..

71. Next, THE EL PASO COUNTY DISTRICT ATTORNEY’S OFFICE never presented this case to a grand jury yet refused to acknowledge the fact that BIGGERS was never indicted. The States Complaining Witness in this case; EPHRAM SIMS, was not in the country when the EL PASO COUNTY DISTRICT ATTORNEY alleges that SIMS testified before a Texas grand jury. Furthermore, the Court provided BIGGERS with two different versions of their fictional indictment. Just like the fictional arrest warrant, the fictional indictment is not clerk stamped until December of 2019; two months after BIGGERS was kidnapped by false arrest from New York. The allegations in the “indictment” directly contradict the facts that appear on the face of SIMS Bexar County no-contact order, and BIGGERS custody/protective Order for her and her children. No person who represents the EL PASO COUNTY DISTRICT ATTORNEY’S OFFICE and no member of law enforcement has been able to produce any arrest warrant for the date of 10/04/2019 as the docket shows. This non-existent warrant was used to falsely arrest and falsely imprison BIGGERS October 2019 by the SHIRLEY NEW YORK POLICE DEPARTMENT and used again by the NEW YORK POLICE DEPARTMENT to falsely imprison BIGGERS October of 2021.
72. The Plaintiffs would go on to be subjected to whistleblower retaliation on an unfathomable scale. The FBI, Department of Defense, law enforcement agencies in multiple states, The ARMY Inspector General, and multiple other state actors operated as a street gang to target the Plaintiffs for reporting fraud, kidnapping, rape, and physical abuse.
73. Even up until the filing of this suit the criminal enterprise has continued to conspire to deprive the Plaintiffs of their civil rights. There is a chronic and continuous pattern of BIGGERS and her children being targeted by multiple municipalities, federal, and state agencies on behalf of the criminal enterprise. Each time BIGGERS has sought the assistance of the Courts or law enforcement they have in turn attacked BIGGERS employment, private residence, and even her person on behalf of the criminal enterprise.

FACTUAL ALLEGATIONS AND BACKGROUND CONTINUED

THE CRIMINAL ENTERPRISE SUBJECTS THE PLAINTIFFS TO WORKPLACE VIOLENCE

74. Despite the childhood adversity described later in this complaint, in the summer of 2005 BIGGERS was a top 25 finalist in the WWE Diva Search contest. The winner of the contest was to be awarded a contract with WORLD WRESTLING ENTERTAINMENT and be trained to become a professional wrestler. BIGGERS was offered a WWE contract at the audition by KEVIN DUNN. Being granted a WWE contract on the spot would prove to put yet another target on BIGGERS back.
75. Within her first two months at WWE’S DEEP SOUTH WRESTLING; the criminal enterprise via WILLIAM DEMOTT , GLEN FULTON, JOHN HUETT, and GLENN JACOBS instructed MICHAEL KNOXVILLE HETTINGA or “MIKE KNOX” to murder BIGGERS during practice by intentionally breaking her neck. MIKE KNOX agreed to murder BIGGERS, however BIGGERS survived KNOX’S attempt to kill her. MIKE KNOX’S attempt to murder BIGGERS knocked BIGGERS out cold. When she awoke from his vicious assault she was paralyzed from the neck down. BIGGERS made a miraculous recovery from the attempt to murder her and regained the feeling in her extremities. She continued her professional wrestling training at DEEP SOUTH.
76. After MIKE KNOX attempted to murder BIGGERS at practice, head trainer BILL DEMOTT began harassing BIGGERS. DEMOTT instructed the other talent to lie and claim that they did not witness the

attempted murder or the abuse BIGGERS was being subjected to. DEMOTT created a hostile work environment for BIGGERS and recruited other individuals to come to DEEP SOUTH to harass her.

77. While at DEEP SOUTH, the criminal enterprise sent KRISTALL MARSHAL to pose as BIGGERS friend and roommate. MARSHAL moved in with BIGGERS to set up hidden cameras in BIGGERS home, to spy on her, and to assist the criminal enterprise in sex trafficking her. While working at DEEP SOUTH, the criminal enterprise also sent HEATH WALLACE MILLER to mutilate, poison, attempt to murder, and to sex traffic BIGGERS. BIGGERS attempted to report the workplace abuse and violence to the WWE office. After BIGGERS made an attempt to inform the WWE office of the abuse, DEMOTT had "I'm calling the office" t-shirts made to mock BIGGERS attempts to get help.
78. THOMAS LAUGHLIN, or "TOMMY DREAMER" began coming to DEEP SOUTH after BIGGERS reported the workplace violence. BIGGERS again reported the violence and abuse to TOMMY DREAMER. TOMMY DREAMER informed BIGGERS that he was "eating dinner with DEMOTT". Next, DEMOTT and TOMMY DREAMER instructed the entire DEEP SOUTH WRESTLING ROSTER to lie and say that they had not witnessed the attempt to murder BIGGERS nor any abuse. Each member of the DEEP SOUTH WRESTLING roster agreed to lie about witnessing MIKE KNOX attempt to murder BIGGERS and the subsequent abuse that she suffered.
79. DEMOTT began attempting to humiliate BIGGERS asking her "who did she f*** to get hired" and continuously talking about BIGGERS beneath her clothing in front of her training class. DEMOTT hired local McDonough, Georgia Ku Klux Klan members to come to Deep South and hurl racial slurs at BIGGERS. For a majority of her time at DEEP SOUTH, BIGGERS was the only African American wrestler employed there. DEMOTT then rewarded a female KKK member for calling BIGGERS a "N*****" by giving her a job on Deep South Wrestling TV.
80. Throughout all of the discrimination, abuse, and workplace violence, BIGGERS was still excelling in her endeavors and performing at a high level in the ring. Nine months after BIGGERS arrived to DEEP SOUTH, DEMOTT and the criminal enterprise discovered that their attempts to sabotage BIGGERS' career and to scare her off had failed. DEMOTT and TOMMY DREAMER learned that BIGGERS was getting called up to WWE television.
81. MARK CARRANO, or "CARRANO" made a visit to DEEP SOUTH WRESTLING to speak to BIGGERS about coming up to television. BIGGERS immediately told CARRANO that she was being abused. When BIGGERS reported the abuse to CARRANO he simply stared at her blankly and smiled. Next, the criminal enterprise retaliated against BIGGERS by impersonating WWE officials with the power to terminate employment. Right after reporting the abuse; JOHN LAURINAITIS and HOWARD FINKLE called BIGGERS. LAURINAITIS and FINKLE lied to BIGGERS and told her that she was fired from the WWE. BIGGERS was never fired from the WWE, she was just no longer welcome in the Ku Klux Klan infested DEEP SOUTH WRESTLING. Despite the fact that BIGGERS was still under contract and had not been fired, LAURINAITIS and FINKLE issued a false press release that BIGGERS was released by the WWE. The workplace proved to be too hostile and too dangerous for BIGGERS at Ku Klux Klan infested DEEP SOUTH Wrestling.
82. While still signed by the WWE, BIGGERS went on to wrestle in promotions around the world. BIGGERS first stop was in Tokyo, Japan. Although DEMOTT refused to allow BIGGERS to have a match at DEEP SOUTH, BIGGERS debut wrestling match in Japan made the top 10 matches of the year.
83. At this time BIGGERS was involved in a serious relationship with HEATH WALLACE MILLER, or "HEATH MILLER". MILLER turned out to be an agent for the criminal enterprise and was sent to mutilate, spy on, stalk, and murder BIGGERS. In 2008 MILLER assisted the criminal enterprise in their second attempt to murder BIGGERS. The choice method of murdering BIGGERS was this time by vehicular homicide. JANE DOE 1 was travelling at a speed of 75 miles per hour down Hillsborough avenue in Tampa and intentionally crashed into BIGGERS who was sitting at a red light. Again, BIGGERS miraculously survived the attempt to take her life. BIGGERS walked away from the car accident with a subdural hematoma.

84. BIGGERS retained Tampa attorney VINCENT PAWALOWSKI to represent her concerning the crash. PAWALOWSKI asked BIGGERS to commit insurance fraud and claim that the accident took away her ability to wrestle and her ability to exercise. BIGGERS did not agree with taking those actions and she accepted an offer to wrestle with IMPACT WRESTLING in the late fall of 2008. After BIGGERS pro wrestling debut on television, PAWALOWSKI angrily cut BIGGERS a check for \$40,000. BIGGERS was expecting a multi-million dollar award for the injuries she sustained. The rest of BIGGERS lawsuit award money from the car accident has not been accounted for. On 6/15/ 2023 BIGGERS checked the docket in Hillsborough County Florida for her lawsuit case. To BIGGERS shock she saw that PAWALOWSKI defrauded her out of her car accident lawsuit. An attorney by the name of JOHN BREWER from the JOHN BREWER LAW GROUP facilitated the dismissal of BIGGERS lawsuit. There is no record of any Motion to Withdraw or any record of substitution of counsel. BIGGERS never hired JOHN BREWER to represent her and has no idea how he became her counsel of record in her car accident lawsuit.
85. After the car accident BIGGERS awoke to her skin being melted away from her body. The only person near BIGGERS was HEATH MILLER. HEATH MILLER had burned BIGGERS skin off while she was sleeping with a chemical substance. A few months later as BIGGERS was ending the relationship with HEATH; HEATH swung a broomstick like a baseball bat at BIGGERS abdomen. After HEATH MILLER attacked BIGGERS with the broomstick, the WWE mocked the attack on their television show and reenacted it.
86. As BIGGERS relationship with HEATH MILLER was ending KURT ANGLE began to pursue BIGGERS romantically. Both BIGGERS and ANGLE were now working at IMPACT WRESTLING. Unaware that ANGLE was stalking her and plotting her demise since she was a child, BIGGERS unfortunately entered into a relationship with ANGLE. In December of 2008, ANGLE asked BIGGERS to move into his home. Starting around April 2009 ANGLE began abusing BIGGERS by biting her in her face, disfiguring her, and knocking out her teeth with punches completely unprovoked. BIGGERS later discovered through his own admission that ANGLE was a heroine addict. ANGLE was also injecting himself with anabolic steroids supplied to him by his manager DAVE HAWK.
87. After ANGLE bit a hole through BIGGERS face, she contacted the Pittsburgh Police Department. Detective DENISE DEMARCO took BIGGERS call. Detective DEMARCO intentionally failed to offer BIGGERS assistance and refused to intervene. Next, DEMARCO informed ANGLE and the criminal enterprise that BIGGERS had called to report his attack. ANGLE started threatening to have BIGGERS fired from her job and destroy her career if she left him. ANGLE informed BIGGERS that “ no one would find out what he had done to her, nor would they believe her.”
88. When MIKE KNOX attempted to murder BIGGERS by breaking her neck he faced no consequences. When HEATH swung the broomstick like a baseball bat at BIGGERS abdomen and burned BIGGERS skin off with acid he faced no consequences. When ANGLE bit a hole through BIGGERS face and knocked out her teeth with punches, he faced no consequences.
89. This Complaint shows how the criminal enterprise has become more bold and brazen in their brutal acts of physical violence and domestic terrorism against the Plaintiffs. The enterprises’ criminal confidence has grown as they have been able to recruit members of the United States military, local law enforcement agencies, companies, corporations, and even officers of the Court to commit violent continuous crimes and civil rights violations.
90. Unlike many victims of rape and violent crimes, BIGGERS did not remain silent or fail to report to law enforcement the crimes committed against her by. Countless attorneys, law enforcement agencies, the United States Army, the Air Force and the FBI- all intentionally failed to intervene. In addition to failing to intervene, these agencies offered their assistance to the criminal enterprise in concealing and committing crimes against BIGGERS.
91. In one instance, BIGGERS called 911 after being beaten by ANGLE at a Holiday Inn Express in Orlando, Florida. The responding ORLANDO POLICE DEPARTMENT officers decided to get ANGLE’S autograph

instead of arresting him as BIGGERS was being rolled away on a stretcher and taken to the hospital by ambulance. There were multiple acts of violence reported by BIGGERS to Orlando law enforcement while the two of them were filming episodes of their television show. When BIGGERS followed up with the ORLANDO POLICE DEPARTMENT and THE ORANGE COUNTY SHERIFF, she was instructed to just "let it go". Not only did these agencies fail to intervene, but in turn they began operating like street gangs against BIGGERS.

92. Over the past two decades the criminal enterprise has rapidly expanded throughout multiple agencies and corporations across the United States. These agencies targeted BIGGERS by allowing and encouraging her to be raped, unlawfully dispossessing her and her children of their private residences, and even putting a gun to BIGGERS head. BIGGERS has been falsely arrested and falsely imprisoned multiple times without probable cause as a retaliatory favor to ANGLE after BIGGERS reported being raped.
93. On or about August 15th 2009, ANGLE was arrested when he was caught stalking BIGGERS at Starbucks within 20 min of being served a domestic violence protective order. BIGGERS used this opportunity to escape ANGLE and fled from their home in Pittsburgh, Pa to Tampa Florida where she had previously resided. After being released from jail ANGLE immediately went on a media spree defaming BIGGERS. ANGLE went on media outlets from Pittsburgh to Tampa including Bubba the Love Sponge calling BIGGERS a liar and asserting that he plans to sue BIGGERS if she continued to speak about what he had done to her.
94. When BIGGERS arrived in Tampa she received a letter informing her that she had been fired from her job at Impact Wrestling as ANGLE had promised. The letter arrived to an undisclosed address where BIGGERS had been taking refuge from ANGLE. The undisclosed address was that of who BIGGERS thought to be a friend from college, VIRGINIA TRAVIS or "TRAVIS". TRAVIS agreed to have BIGGERS stay in his home after she escaped ANGLE only because TRAVIS was also stalking BIGGERS on behalf of ANGLE. TRAVIS would later go on to assist in the kidnapping of BIGGERS and her children.
95. BIGGERS went back to work in real estate, made new friends, and attempted to move on with her life from ANGLE. Although she was a model employee and top performer, on behalf of the criminal enterprise, BIGGERS was harassed and unlawfully terminated from each job she secured from Florida to Illinois to Texas. Although BIGGERS had "escaped" to Florida, she still had to travel back to Pittsburgh, Pa for the Allegheny County case for stalking and domestic violence against ANGLE.
96. ANGLE had the then Allegheny County solicitor MICHAEL SANTICOLA , or "SANTICOLA" on private retainer as his personal attorney before and during his criminal trials in which BIGGERS was the victim. It goes without saying that it is extremely unethical for the county solicitor to be privately retained by citizens in his district, however SANTICOLA boldly represented ANGLE in multiple criminal cases. Prior to ANGLE'S criminal trials for domestic violence and stalking, SANTICOLA went on the local news station and called BIGGERS "a liar" and stated that BIGGERS story "was completely made up." SANTICOLA made these reckless statements about BIGGERS with full knowledge that his statements about her were false , as well, SANTICOLA was fully aware that he was lying , obstructing justice, witness tampering, and committing fraud.
97. The Allegheny County District Attorney's office failed to inform BIGGERS of hearings, failed to inform her that they had dropped charges without a hearing, and did not communicate with her whatsoever. The Allegheny County District Attorney's office intentionally deprived BIGGERS of her civil and crime victims rights. SANTICOLA and Judge MARY MURRAY committed fraud upon the Court to deprive BIGGERS of her civil rights. For the criminal stalking case against ANGLE, BIGGERS traveled to Pittsburgh to attend trial and ANGLE was not present. Somehow, without appearing to stand trial; ANGLE was reportedly found "not guilty" yet there is no court record of this . It appears that ANGLE'S criminal cases with BIGGERS as the listed victim were simply deleted.
98. Concerning the domestic violence case, ANGLE did appear. Solicitor SANTICOLA sat behind his privately retained client in the Court room while his wife, MICHELLE SANTICOLA fraudulently

represented ANGLE. MICHELLE SANTICOLA was BIGGERS co-worker in Tallahassee on promotional modeling campaigns. The next time BIGGERS saw MICHELLE SANTICOLA she was conspiring to interfere with BIGGERS civil rights in a court of law. This is the beginning of a pattern of BIGGERS former co- workers, roommates, and teammates later showing up in multiple jurisdictions throughout the United States as officers of the Court and conspiring to deprive BIGGERS and her children of their civil rights.

99. Just like county solicitor MICHAEL SANTICOLA did, MICHELLE SANTICOLA went on the local news and called BIGGERS “a liar”. MICHELLE SANTICOLA also blamed BIGGERS for not appearing at trial when she was fully aware that he husband’s Allegheny County Prosecutors office failed to inform BIGGERS of the hearing. On the day of trial, ANGLE was given a private room at the hearing while BIGGERS, the victim, sat in the general seating area with the prosecutor, or “ALLEGHENY COUNTY PROSECUTOR 1” still refusing to speak to BIGGERS even up until the commencement of ANGLE’S trial.
100. Solicitor SANTICOLA, his wife MICHELLE SANTICOLA, “ALLEGHENY PROSECUTOR 1” , “JUDGE 1” and Judge MARY MURRAY all conspired to commit fraud upon the Court on behalf of ANGLE and deprive BIGGERS of her civil rights. The criminal cases against ANGLE for violation of protective order and the case for domestic violence against BIGGERS were simply deleted from the Allegheny County Docket and were never adjudicated. BIGGERS was never informed that the District Attorney decided to delete the cases from the docket. In fact, the ALLEGHENY COUNTY DISTRICT ATTORNEY held Court proceedings in which BIGGERS attended. The hearings were fictitious and at each of the fictitious criminal hearings, ANGLE’S charges were “dismissed”.
101. After their acts of fraud upon the Court, ANGLE, solicitor SANTICOLA, and his wife MICHELLE again went on live news to defame BIGGERS. They all claimed that BIGGERS had lied about ANGLE’S acts although they were all aware that BIGGERS was telling the truth.
102. Before, during, and after the trial ANGLE was intercepting BIGGERS mail, taking her paychecks, and depositing them into his Pittsburgh National Bank account . As ANGLE was stealing BIGGERS paychecks, he was also going on the news and attacking BIGGERS claiming that she “had nothing”. ANGLE then recklessly lied and accused BIGGERS of extortion while he was getting high on drugs and purchasing illegal steroids with BIGGERS stolen paychecks.
103. When BIGGERS contacted Detective CORNELIUS STANLEY MUNGER of the Moon Township Police Department about her stolen paychecks, he refused to take the police report and stated that he will not take the report and that the case “wont go anywhere.” When BIGGERS contacted PNC Bank they refused to stop ANGLE from depositing her stolen paychecks into his account. A PNC BANK employee then told BIGGERS that she “shouldn’t have reported ANGLE to the police”. PNC BANK continued to allow ANGLE to steal and deposit BIGGERS checks for years after they were made aware of the fraud.
104. In 2010 BIGGERS began being roommates with SCOTT REID in Tampa Florida. Like multiple other co-conspirators in this complaint, SCOTT REID re-appears later in this complaint identifying himself as an El Paso Attorney named TROY BROWN in 2019 after drastically changing his appearance.
105. SCOTT REID asked BIGGERS to be his roommate to stalk her and to spy on her for the criminal enterprise. SCOTT REID set up hidden cameras in BIGGERS bedroom and bathroom to film her private intimate moments and to use them as blackmail. SCOTT REID eventually went on to unlawfully dispossess BIGGERS of her Tampa home by having CRAIG WRIGHT steal the keys to her apartment.
106. CRAIG WRIGHT also reappears in El Paso Texas in 2021 as the court coordinator for the Plaintiffs family law case before Judge GUADELUPE RIVREA. While acting as Judge RIVERA’S court coordinator, CRAIG WRIGHT was going by the name ALFREDO ALDERETE.
107. After BIGGERS was unlawfully disposed of her Tampa home, she moved to Los Angeles to continue pursuing her dreams of working in the entertainment industry. In late 2010 BIGGERS moved to Van Nuys California and had a roommate by the name of EVAN CAMPBELL. Once again, BIGGERS discovered after moving in with CAMPBELL that he was a member of the criminal enterprise. CAMPBELL turned out to be working for HEATH MILLER to stalk, sabotage, and poison BIGGERS.

108. Within two months of moving into her Van Nuys California home, CAMPBELL moved a man into their apartment without BIGGERS consent. CAMPBELL told BIGGERS that he trusted the man because he was a doctor. This same unidentified man that moved into BIGGERS Van Nuys California apartment re-appears in 2019 as Judge JESUS RODRIGUEZ in the Plaintiffs El Paso County Texas family court case. Like the other co-conspirators, Judge RODRIGUEZ had dramatically changed his appearance. For this reason, BIGGERS did not immediately recognize him. BIGGERS soon uncovered the fact that she was also roommates with Judge RODRIGUEZ while living in Tallahassee, Florida and dating JOHN ROBINSON in 2005. JOHN ROBINSON and Judge RODRIGUEZ are fraternity brothers in Sigma Phi Epsilon. ROBINSON, Judge RODRIGUEZ, and BIGGERS all lived in the same house.
109. When CAMPBELL moved RODRIGUEZ into their shared apartment in 2010, he was sleeping in their living room on the couch. The home was a two bedroom and BIGGERS agreed to only live with one other roommate. Although she didn't recognize RODRIGUEZ at first, she felt extremely uncomfortable with his presence in her apartment. For this reason, BIGGERS demanded that CAMPBELL return her security deposit so that she could find a different apartment.
110. CAMPBELL agreed to return BIGGERS security deposit. CAMPBELL asked BIGGERS to walk with him from their apartment to his bank which was just a couple of blocks away. When they arrived to the bank, CAMPBELL approached the bank teller and stated that BIGGERS was attempting to rob him. CAMPBELL asked the teller to call the LOS ANGELES POLICE DEPARTMENT, "LAPD", as he lied and claimed he was being robbed. BIGGERS was unaware of what was transpiring, however it seemed to be taking much too long for a simple withdrawal. BIGGERS decided to walk back to their apartment and wait for CAMPBELL to return. When BIGGERS got to the front door of their home she was swarmed by LAPD officers and placed in handcuffs. CAMPBELL returned to the apartment and began asking the officers to take BIGGERS to jail. BIGGERS sat in her own apartment handcuffed based off of CAMPBELL'S false report of being robbed. BIGGERS explained to the LAPD that CAMPBELL agreed to return her security deposit and that they walked to the bank together upon his own suggestion. This will show to be one of multiple attempts of the criminal enterprise to falsely accuse BIGGERS of committing a crime and attempt to have her falsely imprisoned.
111. The LAPD eventually removed the handcuffs from BIGGERS and they left the scene. In retaliation, CAMPBELL and RODRIGUEZ set up hidden cameras in the house just like SCOTT REID aka TROY BROWN did. CAMPBELL and RODRIGUEZ filmed BIGGERS in the privacy of her own home and retained the video recordings to use for blackmail. CAMPBELL never returned the security deposit as he promised. BIGGERS last week living in the home with CAMPBELL and RODRIGUEZ she realized that she had been poisoned. That same week, BIGGERS also realized that she was pregnant with M.F..
112. BIGGERS then moved into a newly constructed loft apartment without any roommates. Within a month of moving into her new home, members of the criminal enterprise and HEATH MILLER paid BIGGERS a visit and tagged her home with graffiti. BIGGERS, now pregnant, realized that she had been terrorized by the criminal enterprise in Pittsburgh, Moon Township, Tampa Florida, Van Nuys California, and now Los Angeles California.
113. While in Los Angeles, BIGGERS was booking jobs on television shows with ease. The criminal enterprise was still stalking BIGGERS and began sabotaging her jobs. In fear for her life and the life of her unborn child, BIGGERS left Los Angeles in March of 2011 after HEATH MILLER vandalized her home with graffiti. BIGGERS went back to her home state of Illinois. At this time, BIGGERS was still living in the false manufactured world that was created for her. She didn't realize that the people she thought was her "family" were actually her kidnappers.
114. Her first stop was in Jacksonville Illinois with NORRISE and LARRY LAWRENCE. LARRY AND NORRISE began poisoning BIGGERS with a chemical that caused her to vomit 24 hrs a day. LARRY LAWRENCE and NORRISE LAWRENCE tried to kill BIGGERS and her unborn children while she was pregnant. BIGGERS left that residence and went to stay with DORIS HUETT WILLIAMS who she thought was her grandmother. DORIS HUETT WILLIAMS and JOHN HUETT picked up where LARRY

LAWRENCE and NORRIS LAWRENCE left off and began poisoning BIGGERS again. Although extremely ill from being poisoned, BIGGERS gathered her strength and put her real estate skills to use. They were all trying to kill BIGGERS and her unborn children as they feared they would be exposed for raping BIGGERS as a child, impregnating her, and then kidnapping the newborn children.

115. BIGGERS began contracting her services real estate services to a company named BMI management and moved into her own apartment. As soon as she stopped living with DORIS HUETT WILLIAMS, the violent and constant vomiting stopped. BIGGERS was working as a successful property manager and went into labor while working for BMI MANAGEMENT. BIGGERS went to CARLE HOSPITAL to deliver her children. CARLE hospital had been showing BIGGERS fake sonogram images to make her believe she was only having one child when she was pregnant with multiple children. CARLE HOSPITAL staff put BIGGERS under general anesthesia for a cesarian section after they falsely claimed to BIGGERS that the "fibroid was in the way of her pushing". This was a ploy for them to kidnap BIGGERS babies. That is exactly what they did. Multiple children were removed and the kidnapped from BIGGERS womb. When BIGGERS awoke from surgery she was only given one child .BIGGERS eggs were also stolen and her organs were mutilated.
116. HEATH WALLACE MILLER followed BIGGES from Los Angeles back to Illinois and kidnapped her babies from her womb while she was unconscious. When BIGGERS water had broken that day, she called her former teammate and classmate DIEDRA COBB to take her to the hospital. FRED COBB answered the call. DIEDRA COBB and her father FRED COBB assisted and participated in the kidnappings of the newborn children from BIGGERS womb while she was under anesthesia and also stole her eggs.
117. The criminal enterprise again tormented and harassed BIGGERS by targeting her dwelling place as well as her place of employment. BIGGERS was excelling in her performance as a property manager for BMI MANAGEMENT. BIGGERS soon learned that BMI management was also a part of the criminal enterprise that had been targeting her. BMI MANAGEMENT began targeting BIGGERS by withholding her sales commission checks, salary, and attempting to unlawfully evict her from her home. A malicious retaliatory eviction suit was filed against BIGGERS by BMI MANAGEMENT. BIGGERS ultimately prevailed against BMI management in their frivolous lawsuit, however BIGGERS was still unlawfully pressured into leaving her home and her job once again. This occurrence is consistent with a chronic pattern of BIGGERS being targeted at her place of work and then unlawfully dispossessed of her homes by the criminal enterprise. The criminal enterprise started unlawfully dispossessing BIGGERS of her homes and terrorizing her out of her homes in 2005. These acts of domestic terrorism have never ceased .The criminal enterprise followed BIGGERS to Manhattan and is currently attempting to terrorize her out of her home as of the filing of this Complaint.
118. It was later discovered that STAN BERNSTEIN of BMI management was breaking into BIGGERS' home and raping her while she was pregnant with M.F. in her sleep. STAN BERNSTEIN also placed hidden cameras in BIGGERS residence, filmed her bathing, breastfeeding, and her private intimate acts. Next, he circulated the videos for profit and blackmail without BIGGERS knowledge or consent.
119. Just like SCOTT REID aka TROY BROWN, JESUS RODRIGUEZ, and CRAIG WRIGHT aka ALFREDO ALDERETE; STAN BERNSTEIN also re-appears in Texas in 2022. In Texas, STAN BERNSTEIN represents himself as a Harvard Law school graduate and criminal defense attorney named SHANE ONEAL. As of the filing of this action, BERNSTEIN aka "SHANE ONEAL" is the attorney of record for BIGGERS in her fictitious criminal case
120. Judge ANGIE BARILL (who was also BIGGERS roommate at Illinois College and basketball teammate) hand selected STAN BERNSTEIN aka SHANE ONEAL to represent BIGGERS in the fraudulent case brought against her by the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE.
121. STAN BERNSTEIN aka SHANE ONEAL raped BIGGERS in the exact same manner as the other members of the criminal enterprise. STAN BERNSTEIN aka SHANE ONEAL broke into BIGGERS apartment at night while she was sleeping; drugged her, and then proceeding to have sexual

intercourse with her while she was unconscious. As of the filing of this lawsuit, BIGGERS rapist and former boss STAN BERNSTEIN aka SHANE ONEAL is her court appointed criminal defense attorney of record. BIGGERS called BERNSTEIN out, confronted him, and told him that she is aware that he is not "SHANE ONEAL" and that he didn't go to law school, let alone Harvard. BERNSTEIN is still remaining BIGGERS attorney of record and refuses to inform the Court of the conflict being that he previously drugged and raped BIGGERS while she managed his real estate properties.

122. Another issue in play here is that BIGGERS former roommate Judge BARILL is aware that BERNSTEIN is BIGGERS former boss and rapist. It is for that reason that she hand selected BERNSTEIN aka SHANE ONEAL to represent BIGGERS on this case. Despite all of the preceding trauma, BIGGERS again continued to press forward and move on with her life.
123. As a direct result of the actions of the criminal enterprise, BIGGERS was forced to raise her children alone and in hiding. BIGGERS also started using an alias in attempt to protect her safety from the mob of co-conspirators stalking her. Although BIGGERS had always been a top performer in her choice field of the real estate industry, BIGGERS was harassed and then fired from multiple jobs without explanation. On each of these occasions BIGGERS was asked about her affiliation with KURT ANGLE or the WWE prior to the unexplainable loss of her jobs.
124. For over a decade, the criminal enterprise gang stalked BIGGERS from job to job, from state to state, and from home-to-home sabotaging her efforts to provide for herself and her children.
125. After being terrorized out of her job and home in Champaign Illinois by STAN BERNSTEIN aka SHANE ONEAL, BIGGERS moved back to Tampa Florida with M.F. in 2012. BIGGERS began managing a multifamily housing property for MILESTONE PROPERTY MANAGEMENT. While working at MILESTONE in 2013, BIGGERS manager was JORDAN PETRAS. Just like the previous co-conspirators, JORDAN PETRAS later re-appears in New York City in BIGGERS life and reveals himself to be a part of the criminal enterprise. PETRAS terrorized BIGGERS off of her job and out of her home with MILESTONE MANAGEMENT. After wrongfully terminating BIGGERS, the next time she encounters PETRAS is in 2022. This time JORDAN PETRAS is identifying himself as STEVEN CHAZEZ with BLUE LINE DENTAL in New York City , New York. Just as the previously mentioned co-conspirators, JORDAN PETRAS aka STEVEN CHAVEZ has drastically altered his physical appearance to coincide with his new persona.
126. BIGGERS went into BLUE LINE DENTAL with an infection in her gums. JORDAN PETRAS aka STEVEN CHAVEZ then did a "flush" of BIGGERS gums in an attempt to spread the infection further. BIGGERS face swelled to twice its normal size after being "treated" by JORDAN PETRAS aka STEVEN CHAVEZ. BIGGERS asked PETRAS aka CHAVEZ to write her a prescription for antibiotics. PETRAS aka CHAVEZ refused to give her the prescription. PETRAS aka CHAVEZ was attempting to murder BIGGERS with his dental procedure on behalf of the criminal enterprise.
127. Back to 2015, BIGGERS was managing commercial property at First Central Tower, a high rise in St. Petersburg Florida. While working in Tampa as a single mother, the TAMPA POLICE DEPARTMENT began staking out BIGGERS route home from work with M.F.. THE TAMPA POLICE DEPARTMENT began excessively pulling BIGGERS over without probable cause. The TPD wrote BIGGERS nearly 10 baseless traffic tickets within one month. Next, the HILLSBOROUGH COUNTY DISTRICT Attorney attempted to falsely arrest and imprison her.
128. Next, Tampa Judge ERIC MYER revealed himself to be a part of the criminal enterprise when he issued a fictitious warrant for BIGGERS arrest. These behaviors are consistent with the pattern of the same group of individuals targeting BIGGERS by attempting to falsely arrest and imprison her across multiple states and multiple jurisdictions. The criminal enterprise again psychotically infiltrated BIGGERS life and employment by having her unexplainably let go from First Central Tower and then harassed out of her Tampa Florida home.

THE CRIMINAL ENTERPRISE IN OPERATION AT FORT BLISS

129. In 2015 BIGGERS was entering into a relationship with a man named EPHRAM F. SIMS, or "SIMS". July of 2015 the two were married. BIGGERS moved from Tampa Florida to El Paso Texas where SIMS was stationed in the ARMY. Just as the Plaintiffs became Department of Defense cardholders; Donald J. Trump took the office of United States President.
130. The Plaintiffs expected to live a safe, happy military life. To the contrary, the UNITED STATES ARMY and the entire DEPARTMENT OF DEFENSE turned into a gang of savage street thugs who subjected the Plaintiffs to cruel unusual treatment, savage maulings, and violent crimes. Government investigative agencies including the FBI and the Office of Inspector General brazenly swept crimes committed against the Plaintiffs under the rug.
131. To BIGGERS horror she soon discovered that SIMS was acting on behalf of the criminal enterprise from the inception of the marriage. SIMS was luring BIGGERS and M.F. to El Paso Texas under the guise of marriage to ultimately prevent her from filing this Complaint by murdering or falsely imprisoning her. SIMS and his mother PETULAH MARCIA WILSON began poisoning BIGGERS while she was pregnant with Z.S., and began poisoning M.F. who was only 3 years old. With the assistance of SIMS, the criminal enterprise began plotting to have BIGGERS falsely imprisoned and to have M.F. and Z.S. kidnapped. BIGGERS did not discover this until she became pregnant with Z.S.. SIMS fraudulently married BIGGERS to act as the criminal enterprises' hands and feet.
132. After marrying BIGGERS, SIMS allowed KURT ANGLE and multiple other co-conspirators to break into their home in the middle of the night to drug and gang rape BIGGERS while she was unconscious. These men raped BIGGERS while she was pregnant with Z.S. and her siblings. SIMS act of fraudulently marrying BIGGERS was an outrageous and extreme continuation of the terroristic tactics that **KURT ANGLE'S** criminal enterprise had been using over the past two decades.
133. When the Plaintiffs moved to El Paso, **ANGLE** had already set up a network of criminals in law enforcement and the Courts to conspire to have BIGGERS falsely imprisoned, sex trafficked, kidnapped, and killed. **ANGLE'S** criminal enterprise also had a network in Child Protective Services, the El Paso School Districts, and the Courts to abuse and kidnap M.F. and Z.S. The members of his enterprise had free reign to commit crimes, including rape, domestic violence, and protective order violations. FORT BLISS SOLDIERS including SIMS and ANGLE drugged and raped BIGGERS while she was unconscious in her own home. Their actions were identical to what was done to BIGGERS in her Twin Falls, Idaho dorm room and her private residence in Champaign Illinois.
134. Both BIGGERS pregnancies with Z.S. and M.F. were multiple child births. Just as CARLE hospital did, the WILLIAM BEAUMONT ARMY hospital staff as well as used fake sonogram images at BIGGERS doctor appointments to conceal that BIGGERS was pregnant with multiple children. When BIGGERS gave birth to Z.S. May 17 2016, BIGGERS gave birth to multiple other children. BIGGERS was only given one child. Z.S.'s siblings were kidnapped from BIGGERS womb by WILLIAM BEAUMONT ARMY MEDICAL CENTER staff, Dr. QURANA VEDDOY, KURT ANGKE, JOHN HUETT, JOHN ROBINSON, HEATH MILLER, XAVIER FULTON, EPHRAM SIMS. BIGGERS later uncovered the fact that "Dr. VEDDOY" allowed BIGGERS adversary KIA STEVENS to impersonate her to facilitate the kidnappings of BIGGERS newborn children. KIA STEVENS aka Dr. QURANA VEDDOY filmed BIGGERS vaginal birth of her children with her personal cell phone as she was kidnapping them. JOHN WILLIAM ROBINSON was present at the hospital and wore a disguise as he kidnapped Z.S.'s siblings. The other children BIGGERS gave birth to have never been accounted for. Just as CARLE HOSPITAL did with M.F., WILLIAM BEAUMONT ARMY MEDICAL CENTER falsified Z.S.'s birth records and her birth certificate. Although Z.S. and M.F. were born with multiple siblings at the same time, the birth certificates fraudulently reflect that BIGGERS childbirth had only produced one child.
135. BIGGERS made multiple reports about being raped in her sleep to Dr. VEDDOY before she realized that VEDDOY was actually KIA STEVENS in a disguise. BIGGERS reports of being raped and abused to William Beaumont ARMY Medical Center, the El Paso Police Department, the El Paso County Sheriff, and to the ARMY chain of command including Congressman BETO O'ROURKE concerning the rape

and physical violence were all swept under the rug. Each agency and individual intentionally failed to intervene.

136. Furthermore, these agencies and individuals actually assisted ANGLE, HUETT, ROBINSON, STEVENS, FULTON, and SIMS in raping BIGGERS and kidnapping children from her womb.
137. Concerning being raped during her pregnancy with Z.S., BIGGERS met with the El Paso District Attorney Chief GREGORY ANDERSON. GREGORY ANDERSON immediately told BIGGERS that an El Paso jury "would not convict" ANGLE, SIMS, and their co-conspirators for raping her. After refusing to prosecute the rape, GREGORY ANDERSON shows up later in this Complaint as BIGGERS court appointed attorney in the fraudulent criminal case brought against BIGGERS by the STATE OF TEXAS. GREGORY ANDERSON also declined to represent BIGGERS concerning the unlawful dispossession of her private residence at 3081 Tierra Salada Drive where SIMS, ANGLE, the FBI, and the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE burglarized BIGGERS home. GREGORY ANDERSONS went from declining to accept BIGGERS rape complaint in 2017 to posing as her court appointed attorney in a criminal trial in 2022.
138. On September 29th, 2016 BIGGERS dialed 911 from the marital residence at 3081 Tierra Salada Dr after being physically assaulted by SIMS and restricted from leaving the residence to pick up M.F. from her elementary school. The El Paso Police Pebble Hill department arrived in response to the domestic violence call however again they intentionally failed to intervene. BIGGERS and her victims advocate from the El Paso County District Attorney's Office met with El Paso County Attorney Chief GABRIELLA REED to address the September 29th 2016 failure to intervene in the domestic violence call made to 911. BIGGERS' victim advocate from the El Paso County District Attorney's office shows up again later as the family court reporter for Judge YAHARA GUTIERREZ. GABRIELLA REED agreed to prosecute the domestic violence and instructed BIGGERS to do a video interview with El Paso Police Detective RODRIGUEZ. BIGGERS followed the instruction of REED, then REED intentionally allowed the statute of limitations to run out on the domestic violence charge. This failure to intervene by the El Paso County District Attorney's office and The El Paso County Attorney's Office was a continuation of the chronic pattern of state actors involved in **ANGLE'S** criminal enterprise failing to intervene after being made aware of crimes committed against the Plaintiffs.
139. On October 8th 2016, 9 days after the September 29th attack BIGGERS was brutally beaten by SIMS until she lost consciousness on Randolph Air Force Base in San Antonio, Texas. SIMS was arrested at the scene after an eyewitness called 911. After beating BIGGERS within inches of her life on Randolph Airforce Base, SIMS was promptly granted release by FORT BLISS Commanding General ROBERT PAT WHITE.
140. ROBERT PAT WHITE then went on to blatantly and audaciously aid, abet, and conceal the criminal acts his soldiers committed against the Plaintiffs, and violated his own open door policy when he refused to meet with BIGGERS about the assault.
141. After being physically attacked twice by SIMS, BIGGERS and her daughters began being targeted by EL PASO CHILD PROTECTIVE SERVICES. After BIGGERS September 29th 2016 call to 911; INEKE AALDERTS, or "AALDERTS" of EL PASO CHILD PROTECTIVE SERVICES began attempting to make contact with BIGGERS. Upon interview with AALDERTS, BIGGERS discovered that SIMS had made the call against her to Child Protective Services after he assaulted her. Upon discovery of SIMS false report by a confession from him, AALDERTS verbally reprimanded SIMS and informed BIGGERS that case would be classified as "unfounded". After the October 8th attack, BIGGERS contacted AALDERTS again to let her know about her injuries and her fear for herself, Z.S., and M.F.. The fraudulent case that SIMS opened against BIGGERS after he beat her up was still active. AALDERTS responded to BIGGERS by telling her that she wasn't assigned to that case and could not assist her. AALDERTS refused to make a safety plan, disclosed that she had spoken with XAVIER FULTON and that she was closing the case.
142. Within the same time window as the AALDERTS investigation, CAREY CURRAN, "CURRAN" of Fort Bliss Family Advocacy Program also requested an interview with BIGGERS as they interviewed SIMS.

Again, SIMS admitted to CURRAN that the claims to Child Protective Services were frivolous. CURRAN advised she would be closing the case. CURRAN and the William Beaumont ARMY Medical Center would later go on to cover up SIMS crimes. The Fort Bliss Family Advocacy Program and CURRAN intentionally lied on BIGGERS ,falsely classified SIMS as the victim, and named BIGGERS as the aggressor. After CURRAN intentionally lied and classified SIMS as the victim; SIMS plead guilty to the assault and was convicted of the crime in Bexar County Texas.

143. Upon returning to El Paso after the October 8th 2016 assault, BIGGERS obtained an emergency Order of Protection from the EL PASO COUNTY ATTORNEYS OFFICE. SIMS was arrested for violating the Order of Protection after visiting BIGGERS residence on December 25th, 2016. When SIMS violated the Order of Protection a warrant was issued for his arrest. Fort Bliss intentionally failed to upload SIMS warrant to their database and also failed to turn SIMS in. SIMS freely prowled FORT BLISS and El Paso Texas with an active warrant for his arrest for violating the Protective Order. Likewise, Bexar County and El Paso County failed to upload SIMS active criminal and probation cases into the database so that he could freely terrorize the Plaintiffs.
144. BIGGERS reported SIMS crimes directly to Fort Bliss Military Police Chief MIKE BARNES, or "BARNES". BARNES and his officers failed to intervene, altered BIGGERS police reports, and obstructed the investigation process. Captain Silver of ARMY Criminal Investigation Division "CID" later went on to opine SIMS guilty of the domestic violence. SIMS' command in turn ignored the opine and swept both the domestic violence and the rape under the rug.
145. BIGGERS began working with the El Paso County Assistant District Attorney, MARK W. SPINN on the Protective Order violation brought by the State of Texas against SIMS. SPINN went on to gather information and evidence from BIGGERS for nearly one year frequently talking with BIGGERS on his cell phone and through email. When the day of trial finally arrived, SPINN did not allow BIGGERS into the courtroom. SPINN kept BIGGERS in a holding area for nearly 7 hours and then informed BIGGERS that he was a personal friend of SIMS. SPINN claimed that he didn't realize that the offender was "the same Ephram Sims" that he spent much of his free time with as "drinking buddies". SPINN informed BIGGERS that he would be recusing himself for conflict of interest.
146. After recusing himself for conflict of interest, SPINN would later go on to bring multiple retaliatory and fictitious charges against BIGGERS. SIMS criminal case would be mysteriously dismissed without notifying BIGGERS just as ANGLES charges were in ALLEGHENY COUNTY. SIMS went on to violate BIGGERS order of Protection multiple times after being arrested for the first violation. The EL PASO POLICE SHERIFF and the EL PASO POLICE DEPARTMENT refused arrest SIMS for his protective order violations. Likewise the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE refused to prosecute SIMS for the violations.
147. The intentional failure to intervene in crimes by law enforcement and the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE forced the Plaintiffs out of multiple homes, into domestic violence shelters, and ultimately into New York. Likewise, **ANGLE'S** interference with court ongoing litigation, witness tampering, and sabotaging ongoing criminal military investigations also forced the Plaintiffs to take refuge in domestic violence shelters and to flee the State of Texas. The Plaintiffs soon discovered that **ANGLE'S** criminal enterprise had infiltrated the domestic violence shelters and was controlling the staff. The criminal enterprise had infiltrated domestic violence shelters in every State that the Plaintiffs fled to. The very people who were supposed to protect BIGGERS and her children helped **ANGLE'S** criminal enterprise stalk, terrorize, and kidnap them.
148. All named law enforcement agencies refused to acknowledge and enforce BIGGERS Order of Protection and custody order for her children. All child protection agencies also ignored the Courts protective orders and child custody orders. The criminal enterprise continued to stalk BIGGERS, M.F., and Z.S. as they fled to domestic violence shelters from El Paso Texas to New York.
149. As previously mentioned, when SIMS, ANGLE and FULTON were unable to locate the Plaintiffs, they began circulating a "Wanted " poster of BIGGERS that went viral online. A woman who identified

herself as “Nikki Jay” contacted BIGGERS to inform her that “Her husband was looking for her”. Nikki Jay shared the wanted poster with BIGGERS on Facebook. After receiving the message from “Nikki Jay”, BIGGERS saw ANGLE and SIMS circling her neighborhood block and M.F.’S elementary school in a black hummer. BIGGERS went to the El Paso Police after filing a report for stalking against SIMS online. BIGGERS also went back to the EL PASO COUNTY ATTORNEY to seek a civil order of protection in addition to SIMS active criminal no contact Order.

150. EL PASO COUNTY ATTORNEY CHIEF GABRIELLA REED reappeared. This time REED intercepted BIGGERS protective order application, then told BIGGERS to leave the County Attorneys office because they were about to issue a warrant for her arrest. There was and never has been any probable cause for any arrest of BIGGERS. The warrant GABRIELLA REED threatened BIGGERS with was never issued. REED allowed SIMS to violate his criminal domestic violence probation no contact order and to stalk the Plaintiffs.
151. The report BIGGERS made for stalking was assigned to DETECTIVE MARIO DIAZ #1744. Detective DIAZ concealed and assisted SIMS in violating his probation by stalking BIGGERS. Detective DIAZ falsely asserted in his report that there was a warrant for BIGGERS arrest. Just like the ALLEGHENY COUNTY DISTRICT ATTORNEY, DETECTIVE DIAZ unexplainably downgraded BIGGERS protective order violation case to that of harassment. DIAZ intentionally failed to arrest SIMS for violating the terms of his criminal no contact order from his family violence case. Detective DIAZ informed BIGGERS that he had colluded with SIMS probation officers presiding over his San Antonio domestic violence probation. In an identical pattern of all other co- conspirators with badges, Detective DIAZ abruptly retired after obstructing justice in BIGGERS case.
152. On or about August 2nd 2019 the Plaintiffs were preparing for bed. BIGGERS was laying in bed with M.F. and Z.S. when she heard noises and smelled the strong scent of men’s cologne blowing into her bedroom window from her backyard. BIGGERS knew that ANGLE and or SIMS was preparing to break into BIGGERS home, kill her, and kidnap her children. BIGGERS contacted THE CENTER AGAINST SEXUAL AND FAMILY VIOLENCE and informed them of the stalking and her belief that ANGLE and or SIMS was in her backyard surveying the house. On August 2nd 2019, BIGGERS, M.F., and Z.S. were given a ride to the domestic violence shelter by the EL PASO POLICE DEPARTMENT. On August 3rd 2019 BIGGERS, M.F. and Z.S. woke in the domestic violence shelter to news that a mass shooter was on the loose in El Paso. The gunman had just murdered multiple people at an El Paso Walmart.
153. In a city saturated with law enforcement, El Paso officials claim they were unable to capture the gunman for nearly two hours after the mass shooting. There is reason to believe that the gunman was seeking to murder the Plaintiffs and make it look like a random casualty. This is not the first time that BIGGERS was in the same city as a mass shooter. As a volleyball player at FLORIDA STATE UNIVERSITY BIGGERS found herself in the same city as the DC Sniper while the murders were being carried out.
154. The El Paso mass shooter was identified as PATRICK CRUISES. BIGGERS had previously encountered CRUISES when she was taken to a gun range in Los Angeles, California in 2010. CRUISES stood right next to BIGGERS at the gun range in 2010 firing shots at a target. He then re-appeared in El Paso Texas committing mass murder in 2019. There is reason to believe that the gunman was sent to murder BIGGERS and her children, but failed due to BIGGERS having the instinct to seek refuge in a domestic violence shelter the night prior to the mass murder.
155. In the midst of SIMS and ANGLE stalking BIGGERS and the Walmart mass shooting, the El Paso Times newspaper unexplainably named BIGGERS as one of “El Paso’s Most Wanted Fugitives” for the week of August 25th 2019. The El Paso Times newspaper knowingly and intentionally falsely reported that BIGGERS wanted for felony “Interference With Child Custody” of Z.S.. On August 25th 2019, the El Paso Times republished the article online. The website MSN.com also republished the untruthful story in 2023. Due to BIGGERS career as a professional wrestler, numerous sports news websites republished the article claiming BIGGERS was a Crime Stopper’s Most Wanted fugitive in El Paso

County, Texas. The media also began publishing articles that BIGGERS was indicted by a Texas grand jury although BIGGERS was never indicted by any grand jury. This time the allegation was that of "Aggravated Kidnapping" Z.S.. As previously detailed, there is no evidence that BIGGERS was wanted for custodial interference. No Judge ever signed any warrant. There has never been any evidence that BIGGERS was indicted.

156. Furthermore, it is impossible for BIGGERS to kidnap a child that she birth from her own womb and also had a Court order for legal custody and the protection of that child. It had now become clear that **ANGLE** had expanded his criminal enterprise to include the assistance of El Paso County District attorney JAIME ESPARZA and El Paso County Assistant District Attorney ALYSSA NAVA, or "NAVA"
157. EL Paso Assistant District Attorney ALYSSA NAVA aka ALYSSA LOUGHRAN was BIGGERS co-worker on the set of the Lionsgate Film "WARRIOR" in 2009. NAVA and ESPARZA directly caused in kidnapping of BIGGERS and her daughters in New York by knowingly and intentionally fabricating evidence against BIGGERS in the form of a fraudulent and fictitious felony indictment. As a direct result of the actions of ALYSSA NAVA, the Plaintiffs and her children were forced to flee their home once again into a domestic violence shelter as the STATE OF TEXAS created and compounded the actual danger that they were already in. In August of 2019 BIGGERS and her children were assisted by the Center Against Sexual and Family Violence in El Paso to transferring to La Casa, a domestic violence shelter in Las Cruces New Mexico. While in Las Cruces New Mexico BIGGERS obtained additional orders of protection and custody orders for herself, M.F., and Z.S..
158. While BIGGERS, M.F. , AND Z.S. were being hunted down by the criminal enterprise; BIGGERS family law attorney was TROY BROWN aka SCOTT REID. TROY BROWN aka SCOTT REID extorted \$10,000 from BIGGERS, then proceeded to assist the criminal enterprise in kidnapping her children and falsely imprisoning her.
159. SIMS, FULTON, ANGLE, and the criminal enterprise found BIGGERS and her children in the New Mexico shelter. At each shelter the Plaintiffs fled to , **ANGLE'S** criminal enterprise had employees on the inside as staff. From New Mexico the Plaintiffs fled to Colorado as the criminal enterprise unlawfully pursued them.
160. BIGGERS again reached out to UNITED STATES Congressman ROBERT O'ROUKE'S, or "BETO" office for help. BIGGERS hoped that O'ROURKE would help since he was already familiar with her case through the congressional inquiries she had filed. BIGGERS also believed O'ROURKE would help since it was blatantly obvious that law enforcement and military officials were stalking and pursuing her without a warrant or probable cause that she had kidnapped her child. O'ROURKE's military liaison BENITO TORRES answered BIGGERS call from the Colorado domestic violence shelter . After working with BIGGERS on her congressional inquiries to O'ROURKE'S office; TORRES informed BIGGERS that he would be helping the criminal enterprise kidnap her, falsely imprison her, and kidnap her children.
161. **ANGLE'S** criminal enterprise once again located BIGGERS after Congressman O'ROUKE'S office informed **ANGLE** of BIGGERS whereabouts. BIGGERS and her children were kicked out of the shelter and dropped off on the side of the road in Pueblo, Colorado. On September 18th, 2019 BIGGERS entered into the YWCA Pueblo domestic violence shelter with her children. The YWCA Pueblo required that BIGGERS have an Order of Protection in order for her, M.F. and Z.S. to stay there. BIGGERS provided them with her Court Orders and were then admitted into the YWCA domestic violence shelter. The YWCA Staff then breached BIGGERS confidentiality, violated her orders of protection, and informed the criminal enterprise of her whereabouts. On behalf of **ANGLE'S** criminal enterprise, the YWCA staff the informed BIGGERS that she was no longer allowed to be there.
162. The YWCA staff claimed that BIGGERS had to leave because she had criminal charges. Again, there were no criminal charges against BIGGERS at that time nor even the appearance of charges. The YWCA Staff informed the criminal enterprise that BIGGERS was fleeing to Shirley New York. BIGGERS and her children boarded a flight to New York City and transferred to Brighter Tomorrows, a domestic

violence shelter in Shirley New York. The YWCA had arranged for the Plaintiffs to be kidnapped upon their arrival in New York.

163. BIGGERS had been working with two women named FRANCESCA AMATO and ALICIA JACKSON who had fraudulently presented themselves as domestic violence advocates. The two women turned out to be working for **ANGLE'S** criminal enterprise and assisting him in tracking BIGGERS location upon arrival to New York. October 8th 2019, ALICIA JACKSON contacted BIGGERS to see if she was still at the domestic violence and asked if she needed to go grocery shopping. Approximately one hour later, the Shirley New York Police entered into Brighter Tomorrows arrested BIGGERS without a warrant nor any probable cause and arrested BIGGERS for kidnapping her daughter.
164. Upon the false arrest, BIGGERS provided her custody order for her child and protective order that protected herself, M.F. and Z.S. from SIMS. The Shirley New York Police kidnapped BIGGERS by false arrest and also kidnapped BIGGERS children. The Shirley New York Police Department then called JOHN ZIMMER of SUFFOLK COUNTY SOCIAL SERVICES/ NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES to complete the kidnapping of M.F. and Z.S. from the police station. When JOHN ZIMMER arrived, BIGGERS provided him with a copy of the custody order and protective order just as she had given the SHIRLEY PD. JOHN ZIMMER and his supervisor DELIA CONLON blatantly violated and ignored the protective orders just as the SHIRLEY PD had done. JOHN ZIMMER and DELIA CONLON handed BIGGERS children over to the abuser and failed to take BIGGERS and her children before any New York judge for a hearing.
165. Likewise, the Shirley New York Police and New York fugitive squad stated that BIGGERS El Paso Attorney, TROY BROWN aka SCOTT REID, along with the El Paso District Attorney instructed them to "arrest her anyways" even though there was no warrant.
166. JOHN ZIMMER informed BIGGERS that they were following the instruction of EL Paso Texas child protective services Judge YAHARA GUTIERREZ when they assisted in the kidnapping of BIGGERS children. YAHARA GUTIERREZ, or "GUITERREZ" is the judge who presides over all El Paso Texas child protective services cases. GUITERREZ is currently the head of **ANGLE'S** child trafficking and kidnapping ring in El Paso Texas. BIGGERS divorce case and protective order cases were moved to GUITERREZ'S 65th DISTRICT COURT so that GUITERREZ could target BIGGERS as well as kidnap M.F. and Z.S. on behalf of **ANGLE'S** criminal enterprise. When GUTIERREZ ordered the kidnapping of M.F. and Z.S., she had long been recused from Texas BIGGERS divorce case. THE STATE OF TEXAS/ TEXAS DEPARTMENT OF CHILDREN AND FAMILY SERVICES had no authority or jurisdiction to order the kidnappings of BIGGERS co plaintiffs M.F. and Z.S.
167. Nevertheless, at the order of the recused Texas Judge GUITERREZ, M.F. was kidnapped in Shirley New York, then again kidnapped in New York City and Chicago Illinois. At the instruction of recused Judge GUITERREZ, Z.S. and M.F. were kidnapped in Shirley New York, then again kidnapped in New York City. Both M.F. and Z.S. are currently being unlawfully concealed by the kidnappers in New York City. BIGGERS, Z.S. and M.F. were never taken before any New York Judge before their parent child relationship was unlawfully obliterated.
168. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE, NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES NEW YORK ACS, THE UNITED STATES MARSHAL SERVICE and their NEW YORK/NEW JERSEY FUGITIVE TASK FORCE, The EL PASO COUNTY SHERIFF, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE NEW YORK FUGITIVE SQUAD launched an unprecedented attack on the United States Constitution in their efforts to kidnap BIGGERS, M.F. and Z.S. To this day they have all refused to correct their error in denying the Plaintiffs due process of law.
169. After being kidnapped from BRIGHTER TOMORROWS domestic violence shelter, BIGGERS was taken from the Shirley New York Police Department and falsely imprisoned at Riverhead Correctional Facility. Upon arrival BIGGERS used her one phone call to contact JOHN ZIMMER who facilitated the kidnapping of M.F. and Z.S. JOHN ZIMMER informed BIGGERS on the jail phone that "the children need to be with their father." JOHN ZIMMER did not have the authority to grant custody of Z.S. and

M.F., yet did so without going before any Judge. JOHN ZIMMER informed BIGGERS that he was following the instructions of "Texas" BIGGERS did not have any valid TEXAS CHILD PROTECTIVE SERVICES case open. TEXAS CHILD PROTECTIVE SERVICES had no jurisdiction over BIGGERS children since they had fled the State nearly a month prior. JOHN ZIMMER took these actions because New York ACS is a part of **ANGLE'S** child trafficking and kidnapping ring. NEW YORK ACS is a part of **ANGLE'S** criminal enterprise. Additionally, TEXAS CHILD PROTECTIVE SERVICES, NEW YORK ACS, and the ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES refused to assist BIGGERS although they were fully aware that they all assisted in the kidnapping of M.F., Z.S., and BIGGERS other children.

170. BIGGERS' children have remained kidnapped since October 8th, 2019. Each law enforcement agency that BIGGERS contacted about M.F. and Z.S.'S kidnapping refused to take a missing person report or kidnapping report. THE CENTER FOR MISSING AND EXPLOITED CHILDREN also refused to intervene. BIGGERS has presented custody orders for her children to each of these agencies including the NYPD. The response from NYPD has been to accuse BIGGERS that her Court orders were "fake".
171. The EL PASO POLICE DEPARTMENT and the EL PASO COUNTY SHERIFF informed BIGGERS that the EL PASO COUNTY DISTRICT ATTORNEY instructed them not to enforce her Court orders. The EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE gave these unlawful orders to law enforcement to conceal the fact that they orchestrated the kidnappings of the Plaintiffs from New York.
172. With full knowledge that no warrant or indictment existed, the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE sent PRISON TRANSPORT SYSTEMS to kidnap BIGGERS from Riverhead Correctional Facility to kidnap BIGGERS return her to El Paso Texas to stand trial for a case that does not exist. BIGGERS was kidnapped across state lines from New York to El Paso by PRISON TRANSPORT SYSTEMS or "PTS". The PTS officers brandished weapons at BIGGERS, forced the BIGGERS and the other passengers to ride in a vomit laced van, refused to allow BIGGERS access to a bathroom for more than 12 hours, poisoned BIGGERS, and forced BIGGERS to eat McDonalds for breakfast, lunch, and dinner everyday for 30 days. The PTS officers also continuously attempted to force BIGGERS to eat pork against her religious beliefs or alternately, gave BIGGERS the option to not eat at all. BIGGERS suffered cruel and inhuman treatment by PRISON TRANSPORT SYSTEMS and at multiple correctional facilities across the country as she was kidnapped by extradition.
173. PRISON TRANSPORT SYSTEMS also allowed BIGGERS to be threatened and physically attacked by another passenger, KIMBERLY HICKEY, without intervention. PRISON TRANSPORT SYSTEMS OFFICER 1 and PRISON TRANSPORT SYSTEMS OFFICER 2 displayed pleasure in and endorsed the attack by HICKEY. PRISON TRANSPORT OFFICER 1 participated in the kidnapping, rape, and sex trafficking of BIGGERS while she was a child. When PRISON TRANSPORT OFFICER 3 learned BIGGERS had a protective order that would have resulted in her immediate release upon arrival to El Paso, Texas; she took the Order from BIGGERS and locked it under the Prison Transport Systems van.
174. When BIGGERS went before EL PASO JUDGE 1 in El Paso after extradition, she explained to the Judge that she had custody of the child and an Order of Protection. When the EL PASO JUDGE 1 asked to see the Order, Prison Transport Officer #3 claimed that BIGGERS possessions had been lost. After being released from custody, BIGGERS immediately sought to enforce her custody rights to both children. BIGGERS was released from the EL PASO COUNTY JAIL near the EL PASO COUNTY SHERIFFS OFFICE. BIGGERS was still the listed victim in the EL PASO COUNTY SHERIFFS OFFICE stemming from SIMS domestic violence probation. BIGGERS went to the victims advocate office in the Sheriffs office to seek assistance in getting to a domestic violence shelter. THE EL PASO COUNTY SHERIFF then handcuffed BIGGERS, put her in the back of a squad car, and gave her a ride to the shelter in handcuffs. There was no reason or probable cause for BIGGERS to be handcuffed after she had just been kidnapped at the order of the EL PASO COUNTY SHERIFF.
175. As previously mentioned, it was a non-existent EL PASO COUNTY SHERIFF warrant that the SHIRLEY NEW YORK POLICE DEPARTMENT claimed to have when they kidnapped BIGGERS, M.F., and Z.S. from BRIGHTER TOMORROW'S DOMESTIC VIOLENCE SHELTER. After BIGGERS was returned to

EL Paso, the EL PASO COUNTY SHERIFF assisted SIMS and the criminal enterprise in keeping Z.S. unlawfully concealed. Again, the EL PASO COUNTY SHERIFF informed BIGGERS that they had been instructed to not enforce her protective order and custody order by the EL PASO DISTRICT ATTORNEYS OFFICE. BIGGERS has never seen or spoken to her daughter Z.S. again. As BIGGERS was fighting to rescue Z.S. in El Paso, BIGGERS also took multiple flights to Chicago to enforce her Protective Order and custody Order for M.F..

176. As detailed in BIGGERS “ **COMPLAINT AGAINST BAPTISTE**”, AMANDA FULTON, CODY WILSON, ASHLEY FULTON, XAVIER FULTON AND LIONEL JEAN BAPTISTE kidnapped M.F. and subsequently refused to obey BIGGERS custody order. THE COOK COUNTY SHERIFF and THE CHICAGO POLICE DEPARTMENT refused to enforce the protective Orders and Custody Orders in place for the Plaintiffs. With the assistance of the COOK COUNTY SHERIFF and the CHICAGO POLICE DEPARTMENT these individuals kidnapped BIGGERS children. All of the preceding acts were done in retaliation against BIGGERS for taking her complaints against SIMS up the ARMY chain of command all the way to the Pentagon, and for reporting the sexual and physical violence of the criminal enterprise.
177. The conspiracy to interfere with the Plaintiffs civil rights began in the family court after SIMS raped and beat BIGGERS beyond consciousness. In December of 2016 STEPHANIE JAMES of TEXAS RIO GRANDE LEGAL AID asked BIGGERS to allow her to represent her in the pending Temporary Order of Protection with the intention of interfering with BIGGERS securing the permanent order. Next, without BIGGERS permission, JAMES moved BIGGERS protective order case to YAHARRA GUITIERREZ’S 65th District Court. JAMES moved BIGGERS case to GUITIERREZ’S court because she was aware that GUITIERREZ was a member of **ANGLE’S** criminal enterprise.
178. In 2018 THARPE conspired to have BIGGERS falsely arrested, filed perjury filled Motions into her divorce case, and put a hit out on her life as he had her held at gunpoint while he was retained as her attorney. With the assistance of THARPE, HAGGER, OUISA DAVIS and JAMES, Judge GUITIERREZ went on to go to war against the United States Constitution in BIGGERS divorce for the advancement of **ANGLE’S** criminal enterprise. *See EXHIBIT “APPEAL” and EXHIBIT “MOTION FOR NEW TRIAL”*
179. GUITIERREZ justified abusing her power, abusing her discretion, her actions that deprived BIGGERS, M.F., and Z.S. of their civil rights by proclaiming on record that she was “not going to go against any military decision.” GUTIERREZ admitted on record that she was conspiring with the criminal enterprise to interfere with the Plaintiffs civil rights. GUITERREZ abused her discretion when she proclaimed and decided that she would be colluding with the DEPARTMENT OF DEFENSE in their collective acts to deprive the Plaintiffs of their civil rights. Although SIMS met the criminal standard for the domestic violence in the Texas criminal Court, Judge GUTIERREZ ignored these facts and abused her discretion when she denied BIGGERS request to have her civil protective order heard.
180. In 2016 OUISA DAVIS drafted a joint possession Order, knowingly endangering the lives of BIGGERS and M.F., and Z.S.. The Order intentionally disrupted Z.S.S breastfeeding schedule. When Attorney OUISA DAVIS was BIGGERS’ privately retained divorce attorney, DAVIS used their attorney client relationship to conduct discovery for the criminal enterprise, falsely imprison BIGGERS, and to kidnap BIGGERS’ children. DAVIS asked BIGGERS to provide her a list of all of the witnesses who would testify on her behalf. DAVIS then contacted all of BIGGERS witnesses to intimidate them and to tamper with evidence in the case on behalf of the criminal enterprise. DAVIS then advised BIGGERS to stop showing up for the unlawful custody exchanges. DAVIS did this because she was attempting to build a felony charge against BIGGERS for custodial interference and kidnapping.
181. DAVIS advised BIGGERS to not tell anyone in the Court that SIMS had beaten her unconscious and sexually assaulted her. DAVIS also failed to disclose to BIGGERS that opposing counsel, ISMAEL PEASE, was her mentee.
182. ISMAEL PEASE and OUISA DAVIS together went to war against the UNITED STATES CONSTITUTION in their efforts to kidnap M.F. and Z.S., conceal the kidnapping of BIGGERS other children, and to falsely imprison BIGGERS. After sabotaging BIGGERS divorce case and endangering the lives of

BIGGERS and her children, DAVIS disclosed to BIGGERS the opposing counsel ISMAEL PEASE was “her son”. DAVIS allowed PEASE to obliterate the all attorney ethics to terrorize BIGGERS and her children. DAVIS locked BIGGERS out of “My Case “ while BIGGERS was still her client.

183. After BIGGERS fired DAVIS , RICHARD BRUCE THARPE stepped in on behalf of the criminal enterprise. THARPE extorted \$10,000 from BIGGERS threatening that she would lose her children if she didn't pay. When the EL PASO TIMES published the fake story of BIGGERS being EL Paso's Most Wanted, THARPE again attempted to extort BIGGERS for the third time. THARPE told BIGGERS she would have to pay him \$10,000 not to lose her children and be falsely imprisoned. THARPE, THEOLA HAGGAER, and DAVIS played a key role in BIGGERS false arrest, false imprisonment, as well as the burglarizing and unlawful dispossession of BIGGERS home located at 3081 Tierra Salada Dr.
184. While THARPE was BIGGERS attorney in EL Paso, he withdrew from representing her without her knowledge and filed perjury filled Motions into her case. THARPE retaliated against BIGGERS for BIGGERS not being sexually attracted to him. Before the fictitious “Most Wanted” news story broke, THARPE threatened BIGGERS and told her that he was going to have her arrested. THARPE put a hit out on BIGGERS life and instructed the EL PASO COUNTY SHERIFF to pull BIGGERS over in the rental car he had given her and to shoot her in the head. THARPE also orchestrated the unlawful dispossession and grand larceny of the Plaintiffs home. There was not one attorney in the State of Texas who would offer BIGGERS zealous legal representation without severe and life threatening compromise.

THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE TARGET BIGGERS, BURGLARIZE AND HOLD THE PLAINTIFFS AT GUNPOINT

185. While BIGGERS was the listed victim in their office; the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE began conspiring against BIGGERS along with her privately retained attorneys to have her arrested and falsely imprisoned. After the first hearing concerning the STATE OF TEXAS vs SIMS for violating BIGGERS' Protective Order; Assistant District Attorney MARK SPINN, "SPINN" met with BIGGERS and explained to her that he discovered that the defendant, SIMS, was a "good friend" and "drinking partner" at SIMS then place of employment. BIGGERS had been in constant communication with SPINN for the prior year leading up to trial providing SPINN evidence such as recordings of SIMS attacking BIGGERS, confessing to felonies, thousands videos, photos, Texas messages, and screenshots. Included in the evidence was a video of Sims violating BIGGERS' Order of Protection , and SIMS threatening to use automatic assault rifles against BIGGERS.
186. On the day of SIMS criminal trial for violating BIGGERS Order of Protection, BIGGERS was not allowed to be in the courtroom. After the hearing SPINN informed BIGGERS that he would be recusing himself from prosecution of the case. Without explanation, the DA'S office dropped the charges against SIMS. This behavior is identical to the pattern of the criminal enterprise in ALLEGHENY COUNTY and in NEW YORK COUNTY. After unexplainably dismissing SIMS protective order violation case, and recusing himself for conflict of interest; SPINN then began continuously targeting BIGGERS and bringing frivolous criminal charges against her. SPINN is one of multiple heads of ANGLE'S criminal enterprise in the El Paso County Texas District Attorney's office. After BIGGERS was his listed victim, SPINN began maliciously prosecuting BIGGERS after having her falsely arrested for “interference with public duties” . This false arrest occurred at 3081 Tierra Salada Dr by the El Paso Constable as they assisted the FBI, ANGLE, SIMS, and JACOB CHESTER WILLIAMS in committing grand larceny and unlawfully dispossessing BIGGERS of her home. That day the criminal enterprise stole all of BIGGERS electronic devices and electronic storage devices. SPINN and the EL Paso County District Attorneys Office were now in possession of the laptops and cell phones that BIGGERS had been sending them evidence from.
187. BIGGERS had been communicating by text, email and phone calls with the El Paso County District Attorneys Office on those devices while she was the listed victim in their office. THE EL PASO COUNTY

DISTRICT ATTORNEYS OFFICE and THE FBI burglarized the Plaintiffs home this day to tamper with evidence , to destroy evidence, and to intimidate BIGGERS.

188. RICHARD BRUCE THARPE was BIGGERS privately retained attorney at the time of the unlawful dispossession of her home. Instead of e-filing an application for a restraining order to stop the illegal writ, THARPE emailed BIGGERS the application and instructed her to file it into the wrong Court. BIGGERS dialed 911 during the attack on her property and after being dispatched, the El Paso Police Department did not show up.
189. BIGGERS had been working at Charles Schwab and maintaining the household with just herself and her two daughters. BIGGERS had not been evicted, and all parties assisting SIMS, ANGLE, the FBI, and the El Paso Constable that day were trespassing on BIGGERS property. The burglary and grand larceny of BIGGERS home by the EL PASO CONSTABLE'S OFFICE, THE EL PASO DISTRICT ATTORNEYS OFFICE, and the EL PASO FBI was initiated with a retaliatory eviction lawsuit.
190. After BIGGERS reported being raped, November of 2016 Dan Olivas and Associates and El Paso Collaborative pursued a retaliatory eviction against BIGGERS to remove her and her children from her residence. BIGGERS was not in violation of the lease, nor did she owe DAN OLIVAS and ASSOCIATES any money. BIGGERS represented herself and requested a trial by jury . When it was realized that BIGGERS was beating them at trial, LORRIANE FRIAS, THERESA, EL PASO COLLABORATIVE, and DAN OLIVAS and ASSOCIATES agreed to dismiss the suit mid trial. Judge JESUS URENDA informed the jury that they were dismissed. BIGGERS prevailed against DAN OLIVAS AND ASSOCIATES in their retaliatory eviction suit.
191. After BIGGERS won in the eviction proceedings , payments began pursuant to the settlement stemming from the eviction suits dismissal. PATTI OLIVAS of DAN OLIVAS and ASSOCIATES arrived at Charles Schwab, BIGGERS place of employment, and picked up a rent check BIGGERS left for OLIVAS at security. OLIVAS then fraudulently went back to Judge URENDA and requested he issue a Writ of Possession against BIGGERS pursuant to the eviction suit despite the fact that BIGGERS had won. Although Judge URENDA dismissed the jury and the case after presiding over the case BIGGERS clearly won; URENDA issued an illegal Writ of Possession for the Constable to take possession of BIGGERS and her children's home within 10 days.
192. BIGGERS hired attorney RICHARD ROMAN to stop the illegal Writ of Possession. ROMAN accepted retainer fees from BIGGERS with the intent to extort money from her, then just like BRUCE THARPE, he intentionally filed his Motions for the case into a Court where BIGGERS eviction was not located. ROMAN colluded with the other co-conspirators to assist the criminal enterprise in terrorizing the Plaintiffs. RAMON like each other attorney BIGGERS retained, accepted BIGGERS with the intention of depriving her of her civil rights. When BIGGERS confronted RAMON and asked him to correct his error, he refused.
193. December 12, 2017 THE EL PASO CONSTABLE executed the illegal Writ of Possession. SIMS arrived in a UHaul truck with HEATH MILLER and JACOB CHESTER WILLIAMS to commit grand larceny and burglarize the Plaintiffs home. They were accompanied by LORRAINE FRIAS and THERESA of El Paso Collaborative, and two El Paso Constables, CONSTABLE 1 and CONSTABLE 2 . They were also accompanied by the FBI and about 50 JOHN DOES. SIMS, HEATH MILLER, and JACOB CHESTER WILLIAMS were actively robbing BIGGERS' house with the assistance of the FBI, Constable, and El Paso Collaborative in direct violation of a Restraining Order and an order granting BIGGERS sole and exclusive use of the property. BIGGERS dialed 911 to report SIMS violating the active restraining order and burglarizing her home. Although dispatch stated that help was on the way, THE EL PASO POLICE DEPARTMENT never arrived.
194. When BIGGERS attempted to retrieve items being stolen from her home, CONSTABLE 1 arrested BIGGERS for "Interference With Public Duties". CONSTABLE 1 also took BIGGERS cell phone and deleted the video that she recorded of the burglary in process while he kidnapped her from her own property. CONSTABLE 1 refused to acknowledge the Restraining Order that banned SIMS from the

property and arrested BIGGERS instead. The Constable took BIGGERS back before Judge Jesus URENDA before taking BIGGERS to jail. BIGGERS asked URENDA to not send her to jail since she was not evicted and her home was being robbed. Judge URENDA presided over the eviction and was well aware BIGGERS won. Nevertheless, Judge URENDA ordered BIGGERS to jail, and explained to her that he had spoken to BIGGERS previous attorney OUISA DAVIS before he made his decision. URENDA was operating as a part of **ANGLE'S** criminal enterprise

195. Attorney RAFAEL MORALES was the attorney appointed to BIGGERS' unfounded "Interference With Public Duties" case. Fully aware that BIGGERS had not committed any crime, MORALES advised BIGGERS to take a plea deal. MORALES pressured BIGGERS to do community service and pay a fine for the crimes that had been committed against her. Next, MORALES faked a car accident and stopped communicating with BIGGERS and showing up to Court. While MORALES and TROY BROWN aka SCOTT REID were representing BIGGERS, a warrant for possession of marijuana against BIGGERS unexplainably fell out of the thin air.
196. Without consulting with BIGGERS, MORALES entered a "Not Guilty" plea to the marijuana charges on BIGGERS behalf. BIGGERS was found "Not guilty" without making any appearance or plea .
197. This case fell into Judge RUTH REYES criminal court .REYES law firm had previously agreed to represent BIGGERS in her divorce case prior to being elected as a judge. REYES was also BIGGERS previous roommate and co-worker but was going by the name REBECCA REYES, or REBECCA HARDY. Judge RUTH REYES aka REBECCA HARDY dramatically changed her appearance from the time they were co-workers and roommates while working for MTV'S LUCHA LIBRE MASKED WARRIORS. REYES found no issue in trying to falsely imprison BIGGERS by presiding over the fraudulently brought criminal charges. This will show to be a continuing pattern of BIGGERS former roommates, co-workers, and teammates following her from state to state and city to city , presenting themselves as officers of the court , and then conspiring to interfere with BIGGERS civil rights. Both MORALES and REYES were operating as a part of **ANGLE'S** criminal enterprise.

THE EL PASO COUNTY SHERIFF STALKS BIGGERS - HOLD HER AT GUN POINT IN FRONT OF HER CHILDREN FOR "UNLAWFUL USE OF LANES"

198. Eventually BIGGERS found an apartment for her and her two daughters after the unlawful dispossession of her home. The Plaintiffs moved into TREVINO PLACE APARTMENTS in 2018.
199. As BIGGERS was about to turn into her apartment complex, she noticed red and blue lights flashing in her rearview mirror. BIGGERS decided to pull over one block from her complex, but before she could do so; a man in plain clothes and an unmarked car departed his vehicle and lunged at BIGGERS pointing a gun to her head. Although he was working with the EL PASO COUNTY SHERIFF, the man who attempted to murder BIGGERS by shooting her in the head was in an unmarked car, in plainclothes ,and had no badge showing. BIGGERS was violently ripped from her car by the SHERIFF and handcuffed without probable cause for the traffic stop. This was the hit that RICHARD BRUCE THARPE put out on BIGGERS life while he was privately retained as her attorney.
200. M.F. and Z.S. were eyewitness to the attempted murder of their mother .M.F. was screaming in terror. It was the EL PASO COUNTY SHERIFF unexplainably on a city street pulling BIGGERS over. BIGGERS was given a warning ticket for " improper use of lanes" and sent on her way after being held at gunpoint. A few months later, unexplainably, a warrant for BIGGERS arrest was issued by the El Paso County Sheriff for possession in of marijuana as referenced above. BIGGERS questioned the Sheriff directly about the warrant and was informed that it must have been "inadvertent", or "an accident" . After BIGGERS posted bail for the fictitious charge, mysteriously the Court docket reflects that BIGGERS entered a plea of not guilty before Judge Ruth Reyes. BIGGERS never appeared on the case nor entered a plea after posting bail. After BIGGERS confronted the EL PASO COUNTY SHERIFF,

THE SHERIFF stated that the Deputy that requested the warrant “retired” . Next, the EL PASO COUNTY SHERIFF told BIGGERS that she could come and get her bail money refunded.

THE OPERATIONS OF THE CONSPIRACY AGAINST THE PLAINTIFF’S CIVIL RIGHTS IN ILLINOIS

201. After being kidnapped from BRIGHTER TOMORROWS domestic violence shelter by false arrest, BIGGERS began searching for her kidnapped children to rescue them. ASHLEY FULTON and XAVIER FULTON were broadcasting and boasting the kidnapping of M.F. on Facebook. They had taken M.F. from New York City to Chicago, Illinois. It was later discovered that ASHLEY and XAVIER were also in possession of M.F.’s siblings that were kidnapped from her womb at birth.
202. BIGGERS registered her custody and protective order for M.F. in Cook County Illinois as a foreign Judgement. Each Judge and law enforcement agency in the STATE OF ILLINOIS refused to recognize or enforce the Plaintiffs Custody and Protective Orders. Each Judge and each law enforcement agency in the STATE OF ILLINOIS showed a willful and deliberate indifference to the fact that the Court orders were being violated and assisted the offenders in violating the Orders.
203. BIGGERS and FULTON appeared before Judge RANDALL B ROSENBAUM of Champaign County, Illinois. BIGGERS asked for an emergency enforcement of the Original Order issued out of Champaign County that granted BIGGERS full custody of M.F.. BIGGERS also presented to the Court and additional custody order and protective order for M.F. issued out of Las Cruces New Mexico.
204. Attorney LEROY EKECHUWU appeared with FULTON. EKECHUCKWU knowingly and intentionally lied and told the Court that BIGGERS had been indicted for aggravated kidnapping when he was fully aware that she was not. EKECHUKWU also argued that the ILLINOIS Court did not have jurisdiction as FULTON had sued BIGGERS for custody of M.F. in Texas. FULTON had indeed sued BIGGERS for custody of M.F. in Texas, but it was only after he after he stalked and kidnapped her.
205. EKECHUCKWU also boasted that THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES had given “custody” of M.F. to aka FULTON fully aware that . BIGGERS argued that FULTON kidnapped M.F. and refused to obey the Sheriffs order to return her after being served. Judge ROSENBAUM informed the parties that by Illinois laws BIGGERS had legal custody of M.F.. Judge ROSENBAUM then elaborated by stating that he "didn't like the law" .From there Judge ROSENBAUM refused to enforce BIGGERS' protective Order and Custody Order allowing M.F. to remain kidnapped.
206. ROSENBAUM went on assert he was going to transfer all Motions to Cook County, Illinois to Judge MARY TREW, or “TREW”. The Champaign County docket reflects that the case never successfully transferred to Cook County due to lack of payment. BIGGERS ordered a copy of the transcripts of the proceeding from Judge ROSENBAUM’S COURT REPORTER JUDIE ROBERTS. JUDIE ROBERTS and her staff altered the record taken of the Court proceedings and supplied BIGGERS with an incomplete transcript. BIGGERS requested that JUDIE ROBERTS supply her with the audio of the hearing and JUDIE ROBERTS refused.
207. Back in COOK COUNTY ILLINOIS, Judge TREW, Ekechukwu, and FULTON appeared in Cook County and conducted a hearing for a case that did not exist there.

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Docket Sheet

2011F000719 **BIGGERS TRENESHA vs. FULTON XAVIER A**

Case Closed on 5/29/2020

Return Reverse Date Print Participants Last Date First View

Date	All Case Entries
2020	
08/03/202	Transfer case rejected by Cook County due to no payment.
06/15/202	Case re-submitted Per Transfer Docket Order to Cook County, Domestic Relations Division this day.
06/15/202	Submission rejected by Cook County (Domestic Relations Div.)
05/29/202	All obligations have been met, case is closed.
	Status:Closed Report:Terminated May 29,2020
05/29/202	Case Submitted To Cook County per Judge Rosenbaum Transfer Entry.
05/27/202	Prepared blueback certificate. Defendant FULTON XAVIER A
	Document BLUEBACK.DOC Was Printed
02/04/202	
	Petitioner appears pro se. Respondent appears with counsel Mr.
	Ekechukwu. Respondent argues that this Court has no jurisdiction to

208.

209. In furtherance of **ANGLE'S** criminal enterprise, TREW, FULTON, and Ekechukwu conducted a full trial on matters that were not even before that Court in yet another outrageous act of fraud. TREW issued illegal orders without jurisdiction and without the case existing in her court that granted custody of M.F. to FULTON as well as a fake and baseless Order of Protection.

210. BIGGERS brought these acts of Fraud to the attention of the Texas court with continuing exclusive jurisdiction and a UCCJEA hearing was held. BIGGERS former roommate, Judge JESUS RODRIGUEZ was presiding over the case. At the hearing BIGGERS argued that her child had been kidnapped by BAPTISTE, TREW, and FULTON. **See Exhibit " UCCJEA BRIEF"**. BIGGERS prevailed at the hearing and Orders were issued affirming that the Chicago court never had Jurisdiction to make any such rulings as Texas had never given up jurisdiction.

211. Prior to the UCCJEA conference Judge RODRIGUEZ had signed an Order affirming the kidnapping of M.F. and ordering FULTON to return M.F. to BIGGERS. RODRIGUEZ went on to refuse to enforce his own custody Order and explained to BIGGERS that he was going to reward FULTON for violating the Order. Taking it a step further, Judge RODRIGUEZ instructed the EL PASO POLICE DEPARTMENT and the NYPD to not enforce the Order.
212. In Cook County BIGGERS filed a Motion to Dismiss and asking TREW to vacate the order that she had issued without Jurisdiction. TREW refused to correct her error. TREW continued to attempt to advance **ANGLE'S** criminal enterprise by refusing to correct her error in the kidnapping of M.F.. Judge TREW and ALLEGHENY COUNTY Judge MARY MURRAY appear to be the same person.
213. Prior to JUDGE TREW assisting in the kidnapping and concealment of M.F. from BIGGERS, the CHICAGO POLICE DEPARTMENT ignored BIGGERS custody orders and also assisted in the kidnapping. BIGGERS notified the CHICAGO POLICE DEPARTMENT that she was coming to Chicago to pick up M.F. with and that she had a Court order to do so. Prior to arriving BIGGERS registered the Order as a Foreign Judgement in Cook County.
214. The CHICAGO POLICE 7th District instructed BIGGERS to travel to Chicago and to present her Orders to Parker Elementary School where FULTON had promptly enrolled M.F. after he kidnapped her from New York. Upon arrival to the CHICAGO POLICE DEPARTMENT, BIGGERS was instructed by the desk SGT to travel to the school with the Custody and protective Order and to dial 911 for enforcement.
215. Upon arrival to Parker Elementary BIGGERS dialed 911, presented the Order, and requested the school release M.F. into her care. Parker Elementary School then removed M.F. from the school property out of a back door while they kept BIGGERS in a holding room for nearly an hour. CHICAGO POLICE OFFICER 1 arrived to Parker Elementary School and served BIGGERS with what turned out to be a fictitious "short form" Order of Protection on behalf of FULTON. PARKER ELEMENTARY SCHOOL officials then ordered BIGGERS to leave the school property and to never return again.
216. BIGGERS took the "short form" protective order that the CHICAGO POLICE served her with to the COOK COUNTY CLERKS OFFICE. The COOK COUNTY CLERK informed BIGGERS that their records show no evidence that an Order of Protection for FULTON existed. The record actually showed that FULTON had applied for an emergency Order of Protection after kidnapping M.F., and FULTON'S application was denied twice. Next, BIGGERS had FULTON served on bodycam by the COOK COUNTY SHERIFF. Unexplainably, Sheriff's deputies from Markham, Illinois travelled to downtown Chicago to serve FULTON with the Order.
217. The Sheriff Ordered FULTON to surrender the child, and FULTON told the Deputy "No". The Sheriff accepted FULTON'S refusal to obey the law as being just fine with him. The COOK COUNTY SHERIFF refused to enforce the Order he had just served, allowed FULTON to violate the Order, and to kidnap M.F. BIGGERS then took her Order of Protection to the Cook County Courthouse to have an emergency Judge Order the Sheriff enforce her Order.
218. BIGGERS went before emergency JUDGE LIONEL JEAN BAPTISTE, or "BAPTISTE". The custody and Protective Order had already been registered in Cook County as a Foreign Judgement. BIGGERS explained that FULTON refused to obey the Order and that law enforcement served him with and that law enforcement would not enforce it. BIGGERS explained that the Cook County Sheriff and a private process server had served FULTON and that he was still hiding her child. BAPTISTE agreed to enforce BIGGERS Protective Order which BIGGERS had already registered in Cook County prior to her arrival. Judge BAPTISTE then instructed BIGGERS to take the Order down to the clerks office for a stamp and for the Sheriff to take BIGGERS to pick up her kidnapped child. BIGGERS obtained the clerks stamp and then was instructed to wait for the Sheriff to accompany her to pick up M.F..
219. BIGGERS was left waiting in the clerks office for several hours for a clerks stamp that only took seconds to issue. As the courthouse was closing, a Deputy informed BIGGERS that Judge BAPTISTE wanted her back in the courtroom. When she arrived there, Judge BAPTISTE informed BIGGERS that

he had spoken to FULTON and wife ASHLEY FULTON ex-parte on his cell phone. The Deputy was holding BIGGERS clerk stamped Order in his hand and refused to give it back to her. BAPTISTE then explained to BIGGERS that she would have to wait for the two of them to arrive at the courthouse. At nearly 9 pm, Attorney Leroy EKECHUKWU, XAVIER FULTON and ASHLEY FULTON arrived after speaking to BAPTISTE on his personal cell phone.

220. Judge BAPTISTE asked BIGGERS to explain why she had an Order of Protection against FULTON and why she had a custody order for her child. At the fake hearing, EKECHUKWU presented the fictitious fraudulent kidnapping indictment against BIGGERS. As he trespassed on the Courthouse, BAPTISTE moved to strike his previously issued Order instructing the Sheriff to pick up M.F. and return her to BIGGERS that day.
221. As he trespassed on the Cook County Courthouse; BAPTISTE wrote Orders stripping BIGGERS of her domestic violence Protective order and Custody Order for M.F. that were issued in New Mexico. BIGGERS asked BAPTISTE "Isn't it true that my Protective order and Custody Order is still valid?" BAPTISTE responded "I don't have Jurisdiction to alter your Order".
222. However, as soon as the fictional hearing concluded, that is exactly what Judge BAPTISTE did. Judge BAPTISTE contacted Dona Ana County, New Mexico and fraudulently asserted to the Dona Ana County Judge that a "full evidentiary hearing" had taken place, and that FULTON had been awarded full custody of M.F..
223. In response, BIGGERS hired Chicago attorneys MARCUS GRAY and BRENDAN DAVIS, and JOHN BUCHMILLER and ASSOCIATES to represent her concerning M.F.'S kidnapping. These attorneys and each attorney retained by BIGGERS conspired to interfere with the Plaintiffs parent child relationship and conspired to interfere with their civil rights. Both MARCUS GRAY, BRENDAN DAVIS, and JOHN BUCHMILLER operated as additional hands and feet in ANGLE'S criminal enterprise. Each of them agreed to represent BIGGERS only to assist in the kidnapping of M.F..
224. MARCUS GRAY and BRENDAN DAVIS called BIGGERS with opposing counsel LEROY EKECHUCKWU to inform BIGGERS that they were conspiring to interfere with her civil rights. In Cook County, Illinois no police officer, sheriffs deputy or Judge would enforce BIGGERS custody and Protective Order for M.F.. Each attorney BIGGERS privately retained in COOK COUNTY, ILLINOIS revealed themselves to be a part of **ANGLE'S** criminal enterprise.
225. After BIGGERS late night encounter with Judge BAPTISTE, BIGGERS also contacted CHICAGO LEGAL AID. The CHICAGO LEGAL AID attorneys reviewed BIGGERS case. CHICAGO LEGAL AID declined to offer BIGGERS civil representation. The reason for CHICAGO LEGAL AID'S declination of representation given to BIGGERS was that M.F. had been kidnapped. CHICAGO LEGAL AID then advised BIGGERS to contact Chicago Police. CHICAGO LEGAL AID explained that their organization can only assist in civil matters, and that the nature of what happened to BIGGERS and M.F. was a crime. These actions and lack thereof were an ongoing continuation of multiple legal aid organizations and attorneys working in unison to kidnap and conceal the location of BIGGERS children.

THE CONSPIRACY AGAINST THE PLAINTIFFS CIVIL RIGHTS IN OPERATION IN NEW YORK CITY

226. BIGGERS eventually returned to New York and again contacted THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES/ NEW YORK ACS in hopes that they would correct their error of assisting in the kidnapping of BIGGERS children. BIGGERS opened a new investigation with NEW YORK ACS into the kidnapping of her children in March of 2021.
227. NEW YORK ACS once again refused to correct their error and even referred to BIGGERS by her wrestling character name asking her if she was "Rhaka Khan". The NEW YORK ACS caseworker agreed to meet with BIGGERS and asked for her address. Instead of showing up for the interview, NEW YORK ACS sent the NYPD to the HI HOSTEL, a hotel where BIGGERS was staying. The HI HOSTEL allowed the NYPD unlawfully gained entry to BIGGERS hotel room as the hotel staff opened BIGGERS door for them. The officers informed BIGGERS that they were acting on behalf of New York ACS. BIGGERS

informed the officers that her children were kidnapped. The NYPD officers replied “ It’s not kidnapping” NEW YORK ACS then told BIGGERS that they had no jurisdiction over the children which they had assisted in kidnapping.

228. In 2021 BIGGERS filed a Motion for her kidnapped children in NEW YORK FAMILY COURT. NEW YORK FAMILY COURT JUDGE 1 knowingly and intentionally interfered with the Plaintiffs civil rights when she lied and stated that she “didn’t have jurisdiction” over the children kidnapped from New York.
229. In 2021 BIGGERS also went back to SUFFOLK COUNTY NEW YORK to present the kidnapping of the children from BRIGHTER TOMORROWS to the Court. SUFFOLK COUNTY JUDGE 1 refused to address the kidnapping. BIGGERS went to the SUFFOLK COUNTY DISTRICT ATTORNEY to have the kidnapping of her and her children from BRIGHTER TOMORROWS domestic violence shelter prosecuted. With irrefutable evidence that kidnapping had occurred, THE SUFFOLK COUNTY DISTRICT ATTORNEY’S OFFICE told BIGGERS that “ it’s not kidnapping”. BIGGERS also went to the MANHATTAN DISTRICT ATTORNEY for help with the kidnapping since the children were kidnapped again from New York City. THE MANHATTAN DISTRICT ATTORNEYS OFFICE refused to intervene. ANGLE’S criminal enterprise not only acted the same, but they also spoke the same. Each state actor in unison across the nation claimed “it’s not kidnapping” , or they claimed to have no Jurisdiction over the kidnapping.

BIGGERS IS STRANGLED, STALKED, FALSELY ARRESTED, and KIDNAPPED IN MANHATTAN ON BEHALF OF THE CRIMINAL ENTERPRISE

230. On April 1,2021 BIGGERS moved into a Midtown Manhattan apartment. Three days after move in the landlord , SHELDON JACKLER, "JACKLER" returned and strangled BIGGERS. BIGGERS dialed 911 after the attack, and when the NYPD arrived they initially attempted further endanger BIGGERS life telling her to step into proximity of the attacker and exit her home. JACKLER lied to the police and told them that BIGGERS was squatting in her apartment .JACKLER had just accepted a security deposit from BIGGERS, written a lease agreement, helped BIGGERS move in, introduced her to the building super, and given her keys to the building.Fortunately for BIGGERS, JACKLER’S attack was caught on camera.
231. Upon arrest he asked the officers to "google" BIGGERS to justify his actions. JACKLER and his wife PING PENG JACKLER are currently pursuing a retaliatory eviction against BIGGERS for pressing charges against JACKLER and to continue the pattern of the criminal enterprise.
232. JACKLER also moved HEATH MILLER, KURT ANGLE, XAVIER FULTON aka ANDREW GALLOWAY into the apartment next door to BIGGERS. There is only a wall separating BIGGERS from her rapists,kidnappers, and stalkers.
233. When BIGGERS moved into this apartment she was still “represented” by VERONICA LERMA on the fraudulent criminal case in El Paso,Tx. In approximately May of 2021 BIGGERS got a new cell phone. Within 9 hours of getting a new Metro PCS phone number, El Paso Texas attorney EDUARDO LERMA ,father of BIGGERS' Court appointed attorney, VERONICA LERMA, called BIGGERS new confidential cell phone. BIGGERS had not given her new phone number to anyone. EDUARDO LERMA SR. could provide not provide any reasonable explanation as to how he got BIGGERS brand New York phone number while he was in El Paso Texas. Shortly thereafter, BIGGERS caught EDUARDO LERMA SR. having a conversation with Congresswoman VERONICA ESCOBAR'S Chief of staff, his son EDUARDO LERMA JR. The conversation includes EDUARDO LERMA SR. discussing the conspiracy to falsely imprison BIGGERS and advance **ANGLE’S** criminal enterprise.
234. After EDUARDO LERMA SR. was caught, VERONICA LERMA filed a motion to withdraw from BIGGERS fictitious criminal case.VERONICA LERMA never made any effort to inform the Court that BIGGERS was never indicted .VERONICA LERMA never made any effort to inform the Court that no

warrant was ever issued for BIGGERS arrest. VERONICA LERMA initially withdrew from representing BIGGERS before her and BIGGERS ever met.

235. VERONICA LERMA withdrew initially because she was aware of a preexisting conflict of interest, that the indictment was fake, that there was no arrest warrant, and that BIGGERS had been falsely arrested and imprisoned. VERONICA LERMA then re-accepted appointment to the case because she changed her mind and decided to commit fraud upon the Court to advance ANGLE'S criminal enterprise. VERONICA LERMA had BIGGERS placed on electronic monitoring despite the fact that she knew the criminal case was fraudulent and fictitious from its inception.
236. During LERMA'S Motion to Withdraw hearing Judge SAMUEL 'SAM' MEDRANO, from the bench, asserted that he had been hand selecting attorneys to be appointed to BIGGERS' case. BIGGERS would later file a Motion to recuse MEDRANO for that reason. After being removed from BIGGERS pending case, MEDRANO responded by issuing what would be proven to be an unjustifiable and fictitious extradition warrant for BIGGERS' arrest. In October 2021 the NYPD and the UNITED STATES MARSHAL SERVICE arrived to BIGGERS Manhattan apartment at 5:00am to pick her up on a second fictitious felony warrant for Aggravated Kidnapping. BIGGERS was again strip searched, booked and falsely imprisoned; this time at Riker's Island.
237. HEATH WALLACE MILLER re-appeared at RIKERS ISLAND as a plumber on the maintenance team. At the extradition hearing for BIGGERS, not one scintilla of evidence was presented to justify 915 Bail Bonds seeking revocation nor for Judge SAMUEL 'SAM' MEDRANO issuing the Warrant for BIGGERS.
238. After MEDRANO stepped down from the case, Judge ANGIE BARILL accepted assignment to BIGGERS case. Judge ANGIE BARILL and BIGGERS were classmates, roommates at Illinois College, and played on the same basketball team. Despite these obvious conflicts Judge BARILL continued to preside over BIGGERS case and attempt to assist in the kidnapping of the Plaintiffs and the false imprisonment of BIGGERS by **ANGLE'S** criminal enterprise.
239. Judge BARILL was fully aware that she should have recused herself, as she had just previously recused herself from the El Paso mass shooting case due to the fact that she knew one of the victims. Despite her close previous relationship with BIGGERS, Judge BARILL came out of retirement to preside over BIGGERS case. Judge BARILL took these actions because she was concealing and continuing to perpetuate crimes against BIGGERS on behalf of **ANGLE'S** criminal enterprise.
240. In 2021 and in 2022 ADA ASHLEY MARTINEZ pleaded with the Court to have BIGGERS falsely imprisoned and kidnapped from New Yorks by extradition for a second time. For the second time, a fake arrest warrant issued from the 409th District Court without due process of law or probable cause. The story of BIGGERS being "Wanted" again hit worldwide media websites and the defamatory story spread like wildfire through the sports world. Concerning MEDRANO'S warrant, Judge Barill Ordered BIGGERS be released from Rikers Island and denied ADA MARTINEZ'S request.
241. Although BARILL ordered BIGGERS release it was only because she had no other choice. The false arrest warrant was issued for BIGGERS alleging that she had violated the conditions of her bond. BIGGERS did not have any bond conditions to violate or to enforce. Upon discovery that BIGGERS did not have any bond conditions, Judge BARILL added bond conditions to BIGGERS fictitious case to assist ANGLE in tracking and monitoring her.
242. ADA MARTINEZ attempted to have BIGGERS re- kidnapped and falsely imprisoned multiple times after accepting assignment to the BIGGERS fictitious case. Additionally, MARTINEZ threatened to bring frivolous criminal charges against BIGGERS for harassment in response to BIGGERS sending the EL Paso County Sheriff to conduct a welfare check on BIGGERS kidnapped child, Z.S..
243. On December 14th 2022, Judge BARILL issued the third fictitious warrant from El Paso County's 409th District Court for BIGGERS to be falsely arrested and kidnapped from New York.

244. While the El Paso co-conspirators were frantically attempting to falsely imprison BIGGERS again, BIGGERS was working with OLIVIA WILSON of the MANHATTAN FAMILY JUSTICE CENTER. BIGGERS was seeking the help of the MANHATTAN FAMILY JUSTICE CENTER in reference to the stalking and kidnapping of herself and her children. BIGGERS was also seeking WILSON'S help in the hopes of getting judicial intervention to stop DAVID WOLKINSON from stalking and harassing her on the criminal enterprises' behalf in New York. THE MANHATTAN FAMILY JUSTICE CENTER via OLIVIA WILSON intentionally sabotaged BIGGERS efforts to recover her kidnapped children and also wrongfully denied BIGGERS services for nearly two years.
245. WOLKINSON had previously approached BIGGERS in 2016 offering her assistance as an attorney. When WOLKINSON first approached BIGGERS she still lived in El Paso. WOLKINSON went on to stalk and target BIGGERS from El Paso to New York City. WOLKINSON took these actions because he was actually lead counsel of **ANGLE'S** criminal enterprise. WOLKINSON was also illegally wiretapping, spying on, and monitoring BIGGERS in her private residences. Through this invasion of BIGGERS' privacy WOLKINSON discovered that BIGGERS had spoken to WILSON about getting a protective order against him.
246. After the Manhattan Family Justice Center and OLIVIA WILSON intentionally failed to assist BIGGERS, and after multiple failures to intervene by the NYPD, BIGGERS sought the assistance of NEW YORK LEGAL ASSISTANCE GROUP "NYLAG" in August of 2022. After completing intake, NYLAG agreed to assist BIGGERS with filing a 1983 complaint concerning the actions detailed in this suit. BIGGERS case was assigned to NYLAG paralegals to JARED COHEN and HENRY MUHLHEIM. Both COHEN and MUHLHEIM sabotaged BIGGERS' efforts in filing this suit by giving incomplete instructions and refusing to allow BIGGERS to speak to any attorney. Both COHEN and MUHLHEIM informed BIGGERS that they did not have the knowledge necessary to assist her and that they would attempt to set up a meeting with a NYLAG attorney to assist her. No meeting was ever scheduled and BIGGERS was later told that NYLAG is not "set up" for attorneys to communicate with clients. COHEN and MUHLHEIM refused to give BIGGERS the instructions for filing a Writ of Mandamus to rescue her kidnapped children. NYLAG used BIGGERS intake to conduct discovery on behalf of the criminal enterprise. NYLAG accepted BIGGERS case with no intention of assisting her, only intentions of taking actions to her detriment. COHEN AND MUHLHEIM asked BIGGERS to provide them with the name of every attorney that represented her whom had previously sabotaged her cases. After BIGGERS provided them with this information, COHEN and MUHLHEIM contacted the co-conspirators and informed them that BIGGERS was looking to file this very civil rights lawsuit. COHEN, MUHLHEIM, and NYLAG conspired to deprive BIGGERS and her children of their civil rights by sabotaging her efforts to bring this complaint before the Court.
247. In approximately October of 2022, CHRISTINA COCORAN of NEIGHBORHOOD DEFENDER SERVICE of HARLEM accepted appointment to BIGGERS eviction case versus Sheldon and PENG PING JACKLER with a known conflict of interest. BIGGERS approached CORCORAN about the conflict informing her that CORCORAN real estate had previously discriminated against her for having a Section 8 voucher. CHRISTINA CORCORAN lied to BIGGERS and denied the conflict of interest. As of the filing of this lawsuit, CHRISTINA CORCORAN is still the attorney of record on BIGGERS eviction lawsuit with full knowledge that a conflict of interest exists. CHRISTINA CORCORAN'S goal is to assist the criminal enterprise in wrongfully evicting BIGGERS and unlawfully dispossessing her of her home.
248. In a like manner, PHILLIP KATZ and MICHELLE F.P. ROBERTS accepted appointment to BIGGERS protective order cases against SIMS and FULTON in New York Family Court with the intention of sabotaging BIGGERS efforts to secure the Orders. ROBERTS refused to inform the Court of the conflict of interest after informing BIGGERS that she believed the slanderous accusations made by ANGLE. On March 18th 2023, BIGGERS was forced to file a grievance with the ATTORNEY GRIEVANCE COMMITTEE against ROBERTS to get her to inform the Court of the conflict of interest.

249. ROBERTS was replaced by PHILLIP KATZ as BIGGERS counsel in Manhattan Family Court. After being appointed to represent BIGGERS, KATZ refused to communicate with BIGGERS in any manner whatsoever. On May 11th, 2023, KATZ appeared in BIGGERS Manhattan Family Court case and informed the Court that he had no intention of calling any witnesses at BIGGERS upcoming fact finding hearing. KATZ had not attempted to communicate with BIGGERS at all before he made the decision that he would not be presenting any witnesses on BIGGERS behalf. May 11th 2023, and May 15th 2023 BIGGERS emailed KATZ and asked him to inform the Court of the conflict of interest. KATZ replied spewing venom at BIGGERS and as of the filing of this Complaint; KATZ has not informed the Court of the Conflict of Interest. KATZ went on to no-show two of BIGGERS New York Family Court hearings which resulted in one of her protective orders being dismissed.
250. ROBERTS, KATZ, and CORCORAN, are a part of a mass network of attorneys spanning across the United States who are operating as a terrorist organization as they go to war against the United States Constitution on behalf of **ANGLE'S** criminal enterprise .
251. For the sake of Justice it was necessary for the Plaintiffs to bring this suit before the Court. The Plaintiffs are bringing this suit to force the criminal enterprise to cease in the operations of their shadow government, to end their war against the United States Constitution, and to bring their reign of domestic terrorism to naught. Before BIGGERS daughters and co- Plaintiffs, M.F. and Z.S. were kidnapped in New York, their siblings were kidnapped by being violently ripped from BIGGERS womb at birth by the rapist and the co-conspiring kidnappers named in this Complaint. Without BIGGERS knowledge or consent, the named rapist in this suit including KURT ANGLE filmed themselves raping BIGGERS and distributed the videos of their sex crimes for profit and to blackmail her. Each of these rapes and kidnappings were organized and orchestrated by the criminal enterprise. The injuries inflicted upon the Plaintiffs have been continuous and ongoing. It was necessary to name each Defendant in this complaint as they have each revealed themselves to be members of the criminal enterprise with their sights set on injuring, murdering, raping, and falsely imprisoning the Plaintiffs. It is necessary for the Plaintiffs to bring this Complaint before the Court for the protection and preservation of the Plaintiffs lives. BIGGERS two daughters, co- Plaintiffs M.F. and Z.S. have remained kidnapped and all law enforcement agencies have collectively devised a scheme and agreed to not intervene. This Complaint is also necessary because without Judicial intervention the criminal enterprise will continue to expand putting the very fabric of this country in jeopardy as they invoke war on the United States Constitution. For the sake of Justice, this Complaint is necessary to force law enforcement to intervene in the kidnappings and unlawful concealment of M.F. , Z.S., and their siblings. For these reasons the Plaintiffs are entitled to relief from this Court. The Plaintiffs have turned to this Court in pursuit of Justice.

CLAIM FOR RELIEF ONE:

RAPE

(10 U.S.CODE § 920 and THE NEW YORK ADULT SURVIVORS ACT)

252. Plaintiffs hereby re-allege and re-incorporate fully each paragraphs of this complaint as if fully re-written herein.
253. The Defendants identified in this section are subject to 10 U.S. Code § 920 (a) as they did :
254. Commit a sexual act on BIGGERS by using unlawful force.
255. The Defendants threatened /placed that BIGGERS in fear that she will be subjected to death, grievous bodily harm, or kidnapping;
256. The following Defendants first rendered BIGGERS unconscious prior to committing the sexual acts
257. The sexual acts were done by force, threat of force, or without the knowledge and consent of BIGGERS

258. These Defendants participated in the administering a drug, intoxicant, or other similar substance thereby substantially impairing the ability of BIGGERS to appraise or control conduct; Therefore the following actions of the named Defendants render them guilty of rape.
259. Additionally, a person is subject to 10 U.S. Code §920 (b) when they:
260. Commit a sexual act upon another person by threatening or placing that person in fear;
261. By inducing belief by any artifice, pretense, or concealment that the person is another person;
262. Commit a sexual act upon another person when the person knows or should have reasonably known that the person is unconscious, asleep, or otherwise unaware that the sexual act is occurring;
263. Or commits a sexual act upon another person is incapable of consenting to the act because of impairment by any drug, intoxicant, or similar substance and that condition is known or reasonably should be known by the person; that person is guilty of sexual assault. Each of the following Defendants identified subjected BIGGERS to these described actions.
264. KURT ANGLE, , STAN BERNSTEIN aka SHANE ONEAL, JOHN HUETT, DORIS HUETT WILLIAMS, JOHN WILLIAM ROBINSON, JOHN HUETT, LARRY LAWRENCE, NORRIS LAWRENCE, TIMOTHY MCGILL, and EPHRAM SIMS committed sexual assault and rape against BIGGERS. Each of these named Defendants filmed themselves raping BIGGERS while she was a child, sold the footage for profit, and used the footage to blackmail her.
265. TRENESHA BIGGERS did not consent, and/or was not old enough to consent to the sexual contact.
266. During each sexual encounter with the named Defendants, BIGGERS was drugged, rendered unconscious, and /or asleep when the sexual contact occurred.
267. BIGGERS was a minor at the time of the sexual attacks by TIMOTHY MCGILL, ANGLE, HUETT, LARRY LAWRENCE, NORRIS LAWRENCE, ROBINSON, and WILLIAMS.
268. From 2001-2002 ANGLE , HUETT, and LAWRENCE stalked BIGGERS from Illinois to Twin Falls Idaho. These individuals unlawfully gained entry into BIGGERS Idaho dorm room, drugged her as she slept in her bed, and raped her while she was incapacitated. BIGGERS did not consent to the sexual contact .
269. While attending the College of Southern Idaho, BIGGERS dorm mate and volleyball teammate KERI COATS was aware that BIGGERS was being drugged and raped. COATS is responsible for the rape because she remained silent when BIGGERS informed her she had awakened feeling as if she had been sexually assaulted. COATS was aware that ANGLE, HUETT, and LARRY LAWRENCE were entering her shared dorm room with BIGGERS and that BIGGERS was being raped while unconscious after being drugged.
270. LARRY LAWRENCE and JOHN HUETT both impersonated college students, altered their appearances, broke into BIGGERS dorm room, drugged her and raped her in her sleep.
271. LARRY LAWRENCE impersonated BIGGERS step father to facilitate and coordinate BIGGERS being raped as a minor and throughout her adulthood. Both HUETT and LARRY LAWRENCE recruited other men and women to gang rape BIGGERS as she slept in her bed. While BIGGERS was still a child , she was drugged and raped by DORIS HUETT WILLIAMS and JOHNNIE COCHRAN in a like manner.
272. BIGGERS had taken refuge at WILLIAMS home in efforts to escape abuse from NORRIS LAWRENCE and LARRY LAWRENCE. In addition to raping BIGGERS; WILLIAMS, LAWRENCE, and HUETT assisted, encouraged ,and coordinated the events that lead to BIGGERS being raped by the other named Defendants.
273. BIGGERS being raped resulted in BIGGERS being impregnated before she was even old enough to drive. The rapists along with the LUTHERAN CHURCH then went on to violently rip the children from BIGGERS womb and kidnap them telling BIGGERS that her babies were dead. After raping BIGGERS and ripping the resulting children from her womb, the named Defendants then falsely proclaimed that BIGGERS had murdered her children.

274. JOHN HUETT started sexually assaulting BIGGERS around the age of 7 years old. HUETT then stalked BIGGERS to FLORIDA STATE UNIVERSITY where she had earned a volleyball scholarship. HUETT drastically changed his appearance, disguised himself as a student, and filmed himself raping BIGGERS. BIGGERS was still a minor at the time of this additional sexual assault.
275. From 2015-2016 BIGGERS made multiple trips to William Beaumont Army Medical Center believing that her water had broken and that she was going into premature labor as a result of being raped. It was not BIGGERS water that had broken, it was however semen pouring from her body left behind from being drugged and raped in her sleep. On each of these occasions BIGGERS had awoken from her sleep knowing that her vagina had been penetrated. She explained to her OBGYN DR. QRUANA VEDDOY and other WILLIAM BEAUMONT ARMY MEDICAL CENTER staff that she was not aware that she was having sex with anyone. BIGGERS only recently discovered that it was the criminal enterprise coordinating and orchestrating the violent rapes she was suffering throughout her childhood and as a military spouse at Fort Bliss.
276. BIGGERS was also unaware until recently that it was the criminal enterprise stalking her across the country, drugging and gang raping her.
277. In 2009 BIGGERS went on tour with a pro wrestling company called IMPACT WRESTLING.
278. The company booked hotel rooms for the female talent to all room with one another.
279. BOB RYDER and DIXIE CARTER of IMPACT WRESTLING forced BIGGERS to share a hotel room with KURT ANGLE and did not book her a separate room as they did for the other female talent.
280. Once again, ANGLE began sexually battering BIGGERS by drugging her in her sleep and raping her.
281. Due to their intentional negligence and failure to intervene and protect BIGGERS from the ongoing sexual assaults, DIXIE CARTER, FORT BLISS, THE DEPARTMENT OF DEFENSE, THE ARMY INSPECTOR GENERAL, THE ARMY FAMILY ADVOCACY PROGRAM, WILLIAM BEAUMONT ARMY MEDICAL CENTER, THE EL PASO POLICE DEPARTMENT, THE COLLEGE OF SOUTHERN IDAHO, THE EL PASO COUNTY DISTRICT ATTORNEYS OFFICE, GREGORY ANDERSON, and PANDA ENERGY are all responsible for the rape and sexual battery that BIGGERS suffered.
282. IN 2011, on behalf of the criminal enterprise, BIGGERS was raped while pregnant with M.F. by STAN BERNSTEIN aka SHANE ONEAL.
283. From 2015-2016 BIGGERS was drugged and gang raped by KURT ANGLE, ROBINSON, SIMS and JOHN HUETT while she was pregnant with Z.S..
284. BIGGERS timely reported the rape through the entire ARMY chain of command and to the EL PASO POLICE DEPARTMENT. Each agency intentionally failed to intervene.

CLAIM FOR RELIEF

CLAIM FOR RELIEF 2

FALSE ARREST AND FALSE IMPRISONMENT

(VIOLATION of 42 U.S.C. § 1983-FOURTH AMMENDMENT)

AS AGAINST : SHIRLEY NEW YORK POLICE DEPARTMENT, THE HAMLET OF SHIRLEY, SUFFOLK COUNTY NEW YORK, THE CITY OF NEW YORK, NEW YORK POLICE DEPARTMENT, MANHATTAN DISTRICT ATTORNEY'S OFFICE, THE CITY OF EL PASO, TEXAS, EL PASO POLICE DEPARTMENT, EL PASO COUNTY TEXAS DISTRICT ATTORNEYS OFFICE, EL PASO COUNTY TEXAS, THE STATE OF TEXAS, YVONNE ROSALES, BILL HICKS, RICHARD WILES, ALYSSA NAVA, ASHLEY MARTINEZ, EL PASO COUNTY SHERIFF, THE UNITED STATES MARSHALL SERVICE, DAVID WOLKINSON, JOHN DOE 1-100, JANE DOE 1-100

285. BIGGERS hereby re-alleges and reincorporates each paragraph of this complaint as if fully rewritten herein.
286. A person commits false imprisonment when they unlawfully detain another person against that person's will, and the detention is done without legal process.
287. A person commits the tort of false arrest when they unlawfully arrest another person without probable cause, and the detention is not legally justified.
288. Without probable cause, the SHIRLEY NEW YORK POLICE OFFICER 1 and SHIRLEY NEW YORK POLICE OFFICER 2 entered Brighter Tomorrows domestic violence shelter and kidnapped BIGGERS by false arrest on October 8th 2019. SHIRLEY PD Officer 1 and SHIRLEY PD OFFICER 2 knowingly and intentionally lied to make the arrest stating that there was an active arrest warrant for BIGGERS when they were fully aware that there was not. SHIRLEY POLICE OFFICER 1 and SHIRLEY POLICE OFFICER 2 intentionally lied and proclaimed that they were arresting BIGGERS for kidnapping her daughter Z.S. as they kidnapped Z.S. and M.F. on behalf of the criminal enterprise. Against her will, BIGGERS was handcuffed, removed from BRIGHTER TOMORROWS domestic violence shelter, and unlawfully taken into custody. SHIRLEY POLICE OFFICER 1 and SHIRLEY POLICE OFFICER 2 also kidnapped M.F. and Z.S. from the domestic violence shelter and put them into a separate police car than BIGGERS.
289. BIGGERS provided SHIRLEY POLICE OFFICER 1 and SHIRLEY POLICE OFFICER 2 with her custody Order and active protective order for Z.S. and M.F. Detective GREG MILLER was also fully aware that BIGGERS had legal custody of her children and that no warrant existed for her arrest. Detective GREG MILLER aided and abetted THE STATE OF TEXAS along with SHIRLEY POLICE OFFICER 1 and SHIRLEY POLICE OFFICER 2 in the kidnapping of BIGGERS and her children despite these facts.
290. OFFICER 1 ,OFFICER 2 , and Detective GREG MILLER read the custody order which also included a protective order against SIMS for physically assaulting and stalking the BIGGERS, M.F., and Z.S. OFFICER 1 and OFFICER 2 showed a willful and deliberate indifference to the fact that they had no probable cause for the arrest as they held BIGGERS court orders in their hands.
291. SHIRLEY OFFICER 1 and SHIRLEY OFFICER 2 decided to facilitate the kidnapping of the Plaintiffs from the domestic violence shelter in spite of the Court orders. SHIRLEY PD OFFICER 1 ,SHIRLEY PD OFFICER 2, and Detective GREG MILLER decided falsely imprison BIGGERS despite the obvious absence of probable cause and without any valid arrest warrant.
292. With the absence of probable cause and the absence of an arrest warrant, SHIRLEY POLICE OFFICER 1 and SHIRLEY POLICE OFFICER 2 indeed violated BIGGERS Fourth Amendment right to not be falsely arrested and then falsely imprisoned. SHIRLEY POLICE OFFICER 1, SHIRLEY POLICE OFFICER 2, and Detective GREG MILLER did intentionally falsely arrest BIGGERS which legally equates to kidnapping. This false arrest directly caused the false imprisonment of BIGGERS at Riverhead Correctional facility and multiple jails and prisons across the United States on extradition for a non-existent crime. SHIRLEY POLICE OFFICER 1 and SHIRLEY POLICE OFFICER 2 made the false arrest and subsequently falsely imprisoned BIGGERS with malice, for the purposes of revenge, and the intent to assist in the operations of the criminal enterprise.
293. In October of 2021, El Paso Judge SAMUEL 'SAM' MEDRANO issued a fictitious and retaliatory arrest warrant for BIGGERS. NYPD OFFICER 1, NYPD OFFICER 2, NYPD OFFICER 3, UNITED STATES MARSHAL 1 again kidnapped BIGGERS from her Manhattan apartment by false arrest as they did not have probable cause nor a valid warrant for her arrest. UNITED STATES MARSHAL 1, NYPD OFFICER 1 , NYPD OFFICER 2 , NYPD OFFICER 3, and arrested BIGGERS and had her falsely imprisoned at Riker's Island based upon the same fictitious "aggravated kidnapping " charge in which no indictment nor any valid arrest warrant existed.
294. THE EL PASO COUNTY SHERIFF falsely arrested BIGGERS when they issued a fictional "Possession of Marijuana" warrant for BIGGERS arrest. BIGGERS confronted the Sheriff about the fictitious warrant and they responded that it must have been "a mistake". To this day there is no explanation as to how The EL PASO COUNTY SHERIFF "accidentally" issued a warrant for BIGGERS arrest.

295. December 12th of 2017 DAN OLIVAS and ASSOCIATES initiated a retaliatory and baseless eviction against BIGGERS after she reported being raped to the EL PASO POLICE DEPARTMENT. BIGGERS demanded a Jury trial and Defeated DAN OLIVAS and ASSOCIATES and EL PASO COLLABORATIVE at trial. Judge JESUS URENDA was presiding over the eviction suit. URENDA dismissed the jury after BIGGERS won, and also wrote an Order of Dismissal in BIGGERS favor. Unexplainably, after BIGGERS won the lawsuit in URENDA'S court, DAN OLIVAS and ASSOCIATES along with EL PASO COLLABORATIVE requested and were granted an illegal Writ of Possession for the Plaintiffs home.
296. On December 12th 2017 THE EL PASO CONSTABLES OFFICE trespassed on BIGGERS property at 3081 Tierra Salada Drive and began assisting in the grand larceny and burglary of BIGGERS home. When BIGGERS attempted to remove her stolen items from the U HAUL truck the burglars were loading; EL PASO COUNTY CONSTABLE 1 handcuffed BIGGERS and arrested her for "Interfering with Public Duties". He then took her phone and deleted the video of the burglary in process to tamper with and destroy the evidence of the crime. EL PASO COUNTY CONSTABLE 1 took BIGGERS back before Judge URENDA, the same Judge who presided over the case that BIGGERS won- then issued a Writ of Possession against her. BIGGERS asked Judge URENDA to not send her to jail since he was aware that his writ was illegal , that she was never evicted , and she had not committed any crime. URENDA showed a willful and deliberate indifference to the fact that BIGGERS rights were being violated. He then ordered her false arrest and false imprisonment at the EL PASO COUNTY JAIL.
297. The EL PASO COUNTY DISTRICT ATTORNEYS OFFICE and Assistant District Attorney MARK SPINN issued a warrant for BIGGERS arrest based off of the same false arrest for "Interference with Public Duties". Judge YAHARA GUTIERREZ re- arrested BIGGERS on the same charge as URENDA without probable cause and had BIGGERS falsely imprisoned at the EL PASO COUNTY JAIL again. JOHN DOE 1-100 and JANE DOE 1-100 directly caused the false arrest and false imprisonment of BIGGERS without warrant nor probable cause.

CLAIM FOR RELIEF 3
MALICIOUS PROSECUTION
(42 U.S.C. § 1983)

AS AGAINST: THE MANHATTAN DISTRICT ATTORNEYS OFFICE, ALYSSA NAVA, ASHLEY MARTINEZ, THE EL PASO COUNTY TEXAS DISTRICT ATTORNEY'S OFFICE, MARK WESLEY SPINN, or "MARK SPINN, YVONNE ROSALES, BILL HICKS, ANGIE BARILL, SAMUEL 'SAM' MEDRANO, RUTH REYES ,XAVIER FULTON, ASHLEY FULTON, JOHN DOE 1-100 and JANE DOE 1-100.

298. Plaintiffs re-allege and reincorporate the above paragraphs of this complaint as if fully re-written herein.
299. Each named law enforcement Defendant in the entirety of this complaint has and/or is currently maliciously prosecuting the Plaintiff.
300. Without probable cause THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE prosecuted BIGGERS for "Interference With Public Duties". This charge was initiated by a false arrest by the EL PASO COUNTY CONSTABLES OFFICE. After BIGGERS was falsely arrested and falsely imprisoned, the case was dismissed.
301. Without probable cause THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE prosecuted BIGGERS for "Possession of Marijuana". This case was initiated by what the EL PASO COUNTY SHERIFF explained was a warrant that they issued by "mistake". After BIGGERS was falsely arrested for the "accidental Warrant", the case was dismissed.
302. Without probable cause and without a valid arrest warrant; THE EL PASO DISTRICT ATTORNEY'S OFFICE instructed THE SHIRLEY NEW YORK POLICE DEPARTMENT to break into BIGHTER TOMORROW'S DOMESTIC VIOLENCE SHELTER and to kidnap BIGGES by false arrest.

303. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE claimed that they had an arrest warrant for BIGGERS and had also secured an indictment for "Custodial Interference" and "Aggravated Kidnapping"
304. No arrest warrant for "Aggravated Kidnapping" nor any arrest warrant for "Custodial Interference" has ever existed.
305. Despite the fact that THE EL PASO COUNTY DISTRICT ATTORNEY'S office is fully aware that they never had any warrant and that no Grand Jury indicted BIGGERS, they are currently unlawfully and maliciously prosecuting BIGGERS in these cases.
306. THE EL PASO COUNTY DISTRICT ATTORNEY'S office brought these multiple criminal prosecutions against BIGGERS without probable cause and for the sole purpose of harassing, terrorizing, and intimidating BIGGERS.
307. The EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE intentionally and recklessly targeted BIGGERS while she was the listed victim in their office as well as the BEXAR COUNTY TEXAS DISTRICT ATTORNEY'S OFFICE.
308. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE decided to maliciously prosecute and terrorize BIGGERS while she was the listed victim for the STATE OF TEXAS to obstruct justice and to intimidate her into not testifying.
309. The prosecutions brought forth by the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE against BIGGERS were done so with the sole purpose of unleashing vengeance upon BIGGERS on behalf of the criminal enterprise.
310. Each fictitious criminal charge THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE brought against BIGGERS was done with full knowledge that BIGGERS had not committed any crime and that no probable cause existed.
311. Up until the filing of this suit THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE has continued to maliciously prosecute BIGGERS, issuing baseless warrants for her arrest when they are fully aware that BIGGERS was never charged or indicted in their "Aggravated Kidnapping" case.
312. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE has dismissed nearly 1,000 cases in the past year for failure to indict; however they have unexplainably continued to seek a wrongful conviction of BIGGERS with full knowledge that she was never charged or indicted.
313. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE charged BIGGERS with fictitious crimes and intentionally fabricated fraudulent charging instruments to cover up misconduct and to kidnap M.F. and Z.S..
314. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE charged BIGGERS with fictitious crimes, created fictional indictments, and fictional arrest warrants to divert attention from the actual perpetrators and their criminal enterprise.
315. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE brought unfounded criminal charges against BIGGERS with the intent of harming her reputation.
316. SPINN, ESPARZA, NAVA, ROSALES, HICKS, and MARTINEZ brought these charges forth with the intent to punish BIGGERS by harassing her with criminal proceedings.
317. ANGLE and SIMS are guilty of malicious prosecution as they initiated the frivolous civil and criminal cases. They also filed numerous false police reports against BIGGERS.
318. ANGLE and SIMS were both prohibited by family violence protective orders to not contact BIGGERS by any means, including third party contact. Yet they offered themselves as witnesses in the fictitious criminal cases against BIGGERS.
319. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE violated BIGGERS orders of protection in the efforts to maliciously pursue baseless criminal cases against BIGGERS.
320. There exists no probable cause or reasonable grounds to believe the allegations;

321. In support of the criminal enterprise, Judge SAMUEL 'SAM' MEDRANO issued a frivolous and retaliatory warrant for BIGGERS' arrest in response to her filing and arguing a Motion to Recuse him.
322. MEDRANO issued the unfounded and fictional warrant after he was removed from the case.
323. MEDRANO'S actions resulted in a second false arrest of BIGGERS, this time by the NYPD.
324. Next, October of 2022, THE MANHATTAN COUNTRY DISTRICT ATTORNEY'S OFFICE conspired with the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE and intentionally falsely imprisoned BIGGERS at RIKERS ISLAND for Aggravated Kidnapping and Custodial Interference again..
325. MEDRANO and the MANHATTAN DISTRICT ATTORNEY'S OFFICE had full knowledge that no grand jury met, no grand jury indicted BIGGERS, and that no original arrest warrant existed to initiate the criminal case.
326. In pursuit of the October 2022 false imprisonment of BIGGERS in New York City, MEDRANO knowingly and intentionally signed an arrest warrant for BIGGERS claiming she had violated the terms of her bond conditions.
327. BIGGERS was not subjected to any BOND conditions.
328. There were therefore no bond conditions in existence for BIGGERS to violate.
329. In a like manner, BIGGERS former roommate and teammate Judge ANGIE BARILL issued another baseless arrest warrant for BIGGERS after replacing Judge MEDRANO .
330. December 14th, 2022, Judge BARILL saw no issue attempting to falsely arrest and falsely imprison BIGGERS on the fictitious charges for a third time.
331. In April of 2023, Judge BARILL then followed BIGGERS to the CONSTANCE BAKER MOTLEY GYM in Manhattan and interrupted BIGGERS workout to harass and intimidate her.
332. BIGGERS former coworker and roommate Judge RUTH REYES aka REBECCA HARDY also maliciously prosecuted BIGGERS when she allowed MARK SPINN to pursue retaliatory cases against BIGGERS when no probable cause existed.
333. REYES participated in the malicious prosecution of BIGGERS and falsely imprisoned her for "Interference With Public Duties" and "Possession of Marijuana"
334. Overseeing and supporting the acts of malicious prosecution against BIGGERS were El Paso District Attorneys YVONNE ROSALES, JAIME ESPARZA, and BILL HICKS.
335. ROSALES, ESPARZA, and HICKS have gone to war against the constitution for the advancement of the criminal enterprise.
336. ROSALES, ESPARZA , and HICKS have encouraged the malicious prosecution of BIGGERS by their assistant district attorneys ALYSSA NAVA, MARK SPINN, and ASHLEY MARTINEZ.
337. BIGGERS, M.F., and Z.S. have suffered deprivation of liberty as a consequence of the legal proceedings separate from the initial unlawful seizure caused by the above named.
338. ANDREW GALLOWAY aka XAVIER FULTON has maliciously prosecuted BIGGERS as he initiated a baseless Order of protection proceeding against BIGGERS after he raped BIGGERS and while he was in the act of stalking BIGGERS and kidnapping BIGGERS children.
339. ANGLE is liable for the malicious prosecution because he encouraged and instructed ASHLEY FULTON and ANDREW GALLOWAY aka XAVIER FULTON to pursue frivolous Orders of Protection against BIGGERS.
340. ASHLEY FULTON maliciously prosecuted BIGGERS as she initiated a baseless and frivolous order of protection case against BIGGERS while she was actively stalking BIGGERS and kidnapping BIGGERS children.
341. ASHLEY FULTON and ANDREW GALLOWAY aka XAVIER FULTON initiated baseless and frivolous Orders of Protection cases against BIGGERS only with the intention of kidnapping BIGGERS children and terrorizing her.

342. GLEN FULTON is responsible for the malicious prosecution of BIGGERS because he intentionally and knowingly offered perjurious notarized statements to support the malicious prosecution of BIGGERS by ASHLEY FULTON and ANDREW GALLOWAY aka XAVIER FULTON.
343. JENNIPHER ADKINS is responsible for the malicious prosecution of BIGGERS because she intentionally and knowingly offered perjurious notarized statements to support the malicious prosecution of BIGGERS by AHLEY FULTON and XAVIER FULTON.

CLAIM FOR RELIEF 4
ILLEGAL TRAFFIC STOP, UNREASONABLE SEARCH AND SEIZURE
AND EXCESSIVE FORCE

(42 U.S.C. § 1983- FOURTH AMMENDMENT)

AS AGAINST: THE EL PASO COUNTY SHERIFF, THE EL PASO POLICE DEPARTMET, THE NEW YORK POLICE DEPARTMENT, THE UNITED STATES MARSHAL SERVICE

344. Plaintiffs herby reincorporate and reallege paragraphs above as if fully rewritten herein.
345. In October of 2022, the NYPD unreasonably seized BIGGERS person when they intentionally falsely arrested her and imprisoned her at RIKERS ISLAND without a valid warrant and without probable cause for the arrest.
346. In 2018 the El Paso County Sherrif stalked BIGGERS and tracked her down to her private residence on Lee Trevino Dr.
347. As BIGGERS was about to turn into her apartment complex with her two children, the EL PASO COUNTY SHERIFF initiated an unlawful traffic stop.
348. There were multiple Sheriff vehicles and unmarked cars involved in the illegal stop. The stop was initiated by the flashing of lights and simultaneous action of SHERIFF DEPUTY 1 lunging into BIGGERS car pointing a gun at her head while the children watched in terror from the backseat. Simultaneously another deputy violently ripped BIGGERS from her vehicle and handcuffed her. BIGGERS children screamed in terror as they witnessed SHERRIF DEPUTY 1, SHERIFF DEPUTY 2, SHERIFF DEPUTY 3 , and SHERIFF DEPUTY 4 attack their mother and put a gun to her head. There was no probable cause for the stop.
349. After holding BIGGERS at gunpoint the officers handcuffed BIGGERS for nearly an hour without explanation with her children still watching and screaming in terror. The Deputies began searching BIGGERS vehicle without permission or probable cause. The Deputies were not able to find any reason to take BIGGERS into custody. The Deputies then threatened to take her to jail and have her children taken away if she didn't help them catch a neighborhood drug dealer. Next, DEPUTY 1 who initiated the traffic stop wrote BIGGERS a warning ticket for "improper use of lanes"
350. DEPUTY 1, DEPUTY 2, DEPUTY 3, along with DEPUTIES DOE 1-10 are responsible for the illegal traffic stop and the unlawful search and seizure of BIGGERS and her vehicle because there was no probable cause for the stop. BIGGERS was not improperly using the traffic lanes, and the issuance of the warning ticket alleging that BIGGERS committed the offense further solidifies the fact that the traffic stop was illegal. The use of the firearm and the violent ripping of BIGGERS from the vehicle in the traffic stop constitutes excessive force. This violent unlawful search and seizure by THE EL PASO COUNTY SHERIFF violated the Fourth Amendment of the United States Constitution.

CLAIM FOR RELIEF 5
VIOLATION OF DUE PROCESS
(42 U.S. CODE 1983, 14TH AMENDMENT)

351. Plaintiffs hereby re-allege and reincorporate paragraphs each paragraph in the entirety of this complaint as if fully re-written herein.

352. All persons born within the United States, and subject to the jurisdiction thereof, are citizens of the United States and the State in which they reside.
353. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property without due process of law; nor deny any person within its jurisdiction equal protection of laws.
354. The actions taken by the Defendants named in this Complaint were done intentionally and knowingly in direct violation of the 14th Amendment rights of the Plaintiffs.
355. These Defendants actions would also shock the conscience of any reasonable person.
356. SDNY Judge LAURA TAYLOR SWAIN is denying the Plaintiffs their right to due process of law by refusing to recuse herself from the case due to the fact that she was BIGGERS roommate while BIGGERS was in college, and has dated BIGGERS boyfriends and family members.
357. In October of 2022 the MANHATTAN DISTRICT ATTORNEYS Office violated BIGGERS due process rights when they had the NYPD falsely arrest her, then wrongfully imprisoned her at RIKERS without her ever being charged with any crime.
358. EL Paso County District Attorneys JAIME ESPARZA, YVONNE ROSALES, BILL HICKS, and their Assistant District Attorneys ALYSSA NAVA, MARK SPINN, and ASHLEY MARTINEZ violated BIGGERS 14th Amendment right to due process when they interfered with BIGGERS pending divorce /child custody case by creating fictional criminal charges. These Defendants violated BIGGERS right of Due Process when they fabricated an indictment and arrest warrant against BIGGERS claiming that she violated a court Order that was Void.
359. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE also instructed the NYPD to violate BIGGERS due process rights by having them falsely imprison BIGGERS at RIKERS based off their fictional charges.
360. The above named created multiple fictional criminal cases against BIGGERS to cause direct interference with BIGGERS civil family law case before it was fully adjudicated.
361. This was done to support Judge YAHARA GUTIERREZ in violating BIGGERS 14th Amendment right of Due Process of law in her family law case. Judge GUTIERREZ signed BIGGERS final Decree of divorce AFTER she had been recused from the case. GUTIERREZ took these actions in pursuit of kidnapping BIGGERS children and having her falsely imprisoned. Since GUTIERREZ had been recused from the case, there was no Order for the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE to enforce. ***See Divorce Appeal***
362. ESPARZA, ROSALES, HICKS, NAVA, SPIN and MARTINEZ are all liable for the creation and use of the fictitious indictment and fictitious arrest warrant for Aggravated Kidnapping and Custodial Interference. They created this fictional indictment claiming BIGGERS was in violation of Judge YAHARA GUTIERREZ'S Void Order although the case in GUTIERREZ'S court was not fully adjudicated and in spite of the fact that BIGGERS had legal custody of her child.
363. JESUS URENDA, EL PASO COUNTY COONSTABLE 1 and EL PASO COUNTY CONSTABLE 2 violated the 14th amendment Due Process Clause of the United States Constitution when they unlawfully dispossessed BIGGERS of her private residence located at 3081 Tierra Salada Dr. Before URENDA and an El Paso County Jury, BIGGERS defeated Dan Olivas and Associates in a retaliatory and unfounded eviction case. After BIGGERS prevailed in the case and the eviction suit was dismissed, PATTI OLIVAS went before Judge URENDA ex-parte and requested that a Writ of Possession be issued anyways.
364. Although OLIVAS, FRIAS, and EL PASO COLLABORATIVE had been defeated and their case dismissed, Judge URENDA violated BIGGERS right of due process with his extrajudicial activities as he issued an ex-parte illegal Writ of Possession after the jury was dismissed. Judge URENDA knowingly and intentionally violated BIGGERS 14th amendment right to Due Process when he issued an illegal writ of possession for BIGGERS home after BIGGERS won the eviction suit.

365. EL PASO OUNTY CONSTABLE 1 and EL PASO COUNTY CONSTABLE 2 arrived to BIGGERS home on 12/12/ 2017 along with SIMS and JACOB CHESTER WILLIAMS. Acting off the illegal Writ of Possession, CONSTABLE 1, CONSTABLE 2, SIMS, WILLIAMS , KINGS TOWING,AND JOHN DOE 1-25 showed up to BIGGERS residence, burglarized her home, changed her locks and stole her vehicle. BIGGERS called 911 as the crimes were occurring and El Paso Police were dispatched. CONSTABLE 1 instructed the El Paso Police to not show up to the crime scene. As BIGGERS was having her home burglarized, she began filming. CONSTABLE 1 took BIGGERS cell phone and deleted the video of the ongoing burglary and grand larceny .Next, CONSTABLE 1 handcuffed BIGGERS and asserted that he was arresting her for "Interference with Public Duties". CONSTABLE 1 took BIGGERS before Judge URENDA after the arrest. BIGGERS asked Judge URENDA to release her since he was aware that the arrest was false and that the Writ was illegal. Judge URENDA again violated BIGGERS right of Due Process when he explained that he had spoke to BIGGERS previous family law attorney, OUISA DAVIS, and that he decided to send her to jail anyway .Judge URENDA directly violated the Due Process Clause of the 14th amendment when he issued the illegal writ of possession and then subsequently supported the false arrest of BIGGERS. URENDA violated BIGGERS right to Due process when ordered that BIGGERS be booked into the El Paso County jail in response to his own unlawful activities and the crimes that he subjected BIGGERS to.
366. URENDA made these 14th Amendment violations with intentional and reckless disregard for the law, wanton, and ,malice. URENDA was fully aware that BIGGERS had not been evicted because he was the presiding judge when BIGGERS won the eviction suit. URENDA violated the due process clause of the united states constitution when he deprived the Plaintiffs of their home/property without a hearing and then subsequently arrested BIGGERS for his unlawful act of depriving her of her liberty.
367. After URENDA'S display of reckless disregard for the law, MARK SPINN jumped into the fight and supported the Due Process violations of CONSTABLE 1 and URENDA when he attempted to force BIGGERS to plead guilty to the malicious Interference With Public Duties charge.
368. The Court appointed RAFAEL MORALES to represent BIGGERS on this case. MORALES colluded with SPINN and attempted to force BIGGERS into pleading guilty to a crime that was impossible for her to commit since she was never legally evicted from her home. Additionally, the case was assigned to RUTH REYES. REYES was BIGGERS former co-worker and roommate. REYES drastically changed her appearance and consulted with BIGGERS on related civil matters prior to being elected Judge. After meeting with BIGGERS Judge REYES' office, they agreed to represent her. The next time BIGGERS encountered REYES, REYES was now issuing warrants for BIGGERS arrest and presiding over the malicious Interference with Public Duties case. By refusing to recuse herself and issuing unlawful warrants for BIGGRES arrest, REYES violated the 14th amendment Due Process clause of the United States Constitution. REYES deprived BIGGERS of her liberty. Eventually the case was dismissed, however the dismissal came much too late after the actions of the above named Defendants inflicted the damages that they intended BIGGERS and her children to suffer. BIGGERS home was unlawfully disposed. BIGGERS and her children were forced out of their home and had to move into a hotel. The false arrest and unlawful dispossession of BIGGERS home also caused BIGEGRS to lose her employment at Charles Schwab.
369. After all of these outrageous 14th amendment violations of due process, MARK SPINN still was not done in his efforts to annihilate the United States Constitution. SPINN went on to create a fake arrest warrant for BIGGERS for possession of marijuana. The Warrant for possession of marijuana fell out of the clear blue sky without explanation. BIGGERS was never arrested for possession of marijuana. The case fell into REYES court yet again with MORALES posing as BIGGERS criminal defense attorney. After issuing the fictitious warrant for BIGGERS arrest, SPINN proclaimed that he was "recusing himself".SPINN had no business issuing warrants for BIGGERS arrest after he was the prosecuting attorney assigned to cases in his office when BIGGERS was his listed victim. BIGGERS never appeared

before REYES on the charges, yet magically the court docket reflects that on 05/15/2019 BIGGERS entered a plea of not guilty. BIGGERS did not enter any plea. On 05/15/2019 the case was dismissed.

370. The actions named above constitute egregious violations of Due Process by SPINN, REYES, and the El Paso County District Attorney's office. Prior to the fictitious warrant for "Possession of Marijuana" unexplainably fell out of the sky against BIGGERS, the El Paso County Sheriff launched an unwarranted attack against BIGGERS, M.F. , and Z.S. when they conducted an unlawful traffic stop.
371. EL PASO COUNTY SHERIFF DEPUTY 1 lunged from his vehicle into BIGGERS car and pointed a gun to her head with her children M.F. and Z.S. watching the attack from the back seat of the car. The El Paso County Sheriff violently ripped BIGGERS from her vehicle after holding her at gunpoint and placed her in handcuffs for an extended period of time. After invoking terror on BIGGERS, M.F., and Z.S. and threatening BIGGERS life by pointing a gun to her head; the El Paso County Sheriff wrote BIGGERS a warning ticket and claimed that they took the violent actions against her for "unlawful use of lanes."
372. Despite their obvious constitutional violations, the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE audaciously began plotting and planning another violation of the due process clause of the United States Constitution against BIGGERS. On September 18th 2019, JAMIE ESPARZA, MARK SPINN, ALYSSA NAVA, RICHARD WILES, concocted a fictional felony indictment of "Interference with Child Custody" and Aggravated Kidnapping" against BIGGERS without a grand jury ever meeting. ESPARZA, HICKS, NAVA, SPINN, ,MARTINEZ are all currently pursuing (and or previously pursued) a wrongful criminal conviction against BIGGERS based off of a fraudulent non-existent warrant and a non-existent felony indictment. These actions are a display of their reckless disregard for the law and their ongoing war against the Due Process Clause of the United States Constitution .
373. The targeting of BIGGERS by these fake indictments and nonexistent arrest warrants were preceded by the 14th amendment due process violations of Judge YAHARA GUITIERREZ against BIGGERS in the family court. GUITERREZ egregiously abused her discretion concerning BIGGERS family law case and went on to assist in the kidnapping of Z.S. as detailed in the ***Divorce Appeal Exhibit***
374. Cook County Judge LIONEL JEAN BAPTISTE violated the 14th Amendment Due Process Clause of the United States Constitution assisting in the kidnapping of M.F..
375. Judge BAPTISTE trespassed on the Court at 9:00 at night and fraudulently issued Orders in effort to assist in the kidnapping of M.F. from BIGGERS. See ***Complaint Against Baptiste Exhibit***.
376. Cook County Judge MARY TREW violated the 14th Amendment Due Process Clause of the United States Constitution assisting in the kidnapping of M.F. Judge TREW trespassed on the Court , criminally presided over a custody case for M.F., and issued orders to strip BIGGERS of her parental rights to her child when the case and subject matter did not exist in Cook County. See ***UCCJEA BRIEF Exhibit***.
377. NEW YORK CITY ACS and THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES violated the 14th Amendment Due Process Clause of the United States Constitution when they assisted in the capture and kidnapping of M.F. and Z.S. from Brighter Tomorrows, the domestic violence shelter where BIGGERS and her children were taking refuge. When New York ACS assisted in the kidnapping of M.F. and Z.S. , CASEWORKER 1 was in possession of a Court order that granted BIGGERS full custody of Z.S. NEW YORK ACS granted "custody" of BIGGERS children to FULTON and SIMS without going before any New York Judge. When NEW YORK ACS and THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES violated BIGGERS protective and custody Orders for M.F. and Z.S. they violated the Due Process Clause of the United States Constitution.
378. When NEW YORK ACS and THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES superseded the judicial process to remove a child from the custody of their legal custodian, New York ACS violated the Due Process Clause of the United States Constitution.

379. TEXAS CHILD PROTECTIVE SERVICES and Judge GUTIERREZ violated the Due Process Clause of the United States Constitution when they instructed NEW YORK ACS to kidnap Z.S. and M.F. from BIGGERS although BIGGERS was then children's legal custodian by court order. Texas Judge GUTIERREZ was recused from BIGGERS divorce and custody case, then she ordered NEW YORK ACS to kidnap the children. This act by GUTIERREZ obliterated the Due Process Clause of the United States Constitution.

CLAIM FOR RELIEF 6:

FEDERAL KIDNAPPING ACT BY CONSPIRACY TO KIDNAP AND BY KIDNAPPING
(18 U.S.C. § 1201)

380. Plaintiffs re-allege and reincorporate each paragraph of this complaint as if fully re-written herein.
381. The above named Defendants and the each Defendants named in the entirety of this Complaint are in violation of 18 U.S. CODE 1201 as they:
382. Unlawfully seized, kidnapped, inveigled, carried away, and abducted, and held for ransom persons they were not the parents of;
383. The named Defendants failed to release the kidnapped persons within 24 hours.
384. Two or more persons did conspire to kidnap the Plaintiffs and her children and have unlawfully concealed them for a period continuous of years. Each Defendant named in the entirety of this complaint participated in kidnapping the Plaintiffs and her children through a wide variety of means.
385. These Defendants collectively attacked BIGGERS while giving birth and also cut the children from her womb while she was unconscious. The children were kidnapped by being violently ripped from BIGGERS womb, by stealing BIGGERS eggs.
386. This was not an "ordinary" kidnapping. These Defendants had the criminal enterprise on standby to assist in the kidnapping. The criminal enterprise is most dangerous concerning kidnapping because many of the kidnappers are state actors.
387. According to 18 U.S.C. 1201, a person is guilty of kidnapping who unlawfully seizes, confines, inveigles, decoys, kidnaps, abducts or carries away and holds for ransom or reward otherwise any person. The Defendants acts of kidnapping violate the Federal Kidnapping act because each Plaintiff was carried away and abducted against their will across state lines.
388. There is reason to believe that SDNY Chief Judge LAURA TAYLOR SWAIN orchestrated the kidnappings of BIGGERS and her children M.F. and Z.S., and that SWAIN is or has been in possession of BIGGERS children whom were kidnapped from her womb at birth from Carle Hospital and William Beaumont ARMY Medical Center.
389. On October 8th 2019, THE SHIRLEY NEW YORK POLICE DEPARTMENT kidnapped BIGGERS, M.F. and Z.S. from BRIGHTER TOMORROW'S domestic violence shelter in Shirley New York.
390. After raping BIGGERS and impregnating her while she was still a minor child, JOHN HUETT, HEATH MILLER, XAVIER FULTON kidnapped BIGGERS children by cutting her open and ripping the children from BIGGERS womb. After completing the violent kidnapping HUETT attempted to conceal the kidnapping by stating that BIGGERS had murdered the children. DORIS HUETT WILLIAMS is responsible for the kidnapping because she was aware of the actions of HUETT and assisted him in kidnapping BIGGERS children in 1999, 2011, and 2017.
391. In 2011 HUETT and WILLIAMS again kidnapped BIGGERS children by following her to the hospital where she was giving birth to M.F. and her siblings. They also concealed the kidnapping of BIGGERS children. HUETT and WILLIAMS kidnapped M.F.'S siblings from Carle hospital on October 21st of 2011.
392. On May 17th 2016, LARRY LAWRENCE, HEATH MILLER, NORRIS LAWRENCE, VIRGINIA TRAVIS, KIA STEVENS, JOHN ROBINSON, DIEDRA COBB, HUETT, WILLIAMS and JOHN DOES of the criminal

enterprise stalked BIGGERS to WILLIAM BEAUMONT ARMY MEDICAL CENTER where she was giving birth to Z.S..

393. LARRY LAWRENCE, NORRIS LAWRENCE, HEATH MILLER, STEVENS, COBB, ANGLE, ROBINSON , HUETT, WILLIAMS and JOHN DOES of the criminal enterprise kidnapped Z.S.'S siblings from BIGGERS womb at WILLIAM BEAUMONT ARMY MEDICAL CENTER.
394. These named Defendants participated in the kidnapping and concealment of BIGGERS children in 1999,2011 ,2016 and 2019.
395. DIEDRA COBB and FRED COBB conspired to kidnap and actually kidnapped BIGGERS children from Carle Hospital in 2011 and stole BIGGERS eggs.
396. COBB is responsible for the 1999 kidnappings, the 2011 kidnappings, and the 2016 kidnappings because he conspired to kidnap BIGGERS children each time, was aware of the kidnappings occurring, and proceeded to assist in the unlawful prolonged concealment of the kidnapped children.
397. CARLE HOSPITAL, The LUTHERAN CHURCH, and WILLIAM BEAUMONT ARMY MEDICAL CENTER are responsible for the kidnappings of M.F. and Z.S.'S siblings because they assisted WILLIAMS, ROBINSON, and HUETT in conspiring to kidnap and kidnapping of BIGGERS' children.
398. LARRY LAWRENCE and NORRIS LAWRENCE are responsible for the kidnappings of BIGGERS children in 1999 because they aided and abetted the kidnappers. They were aware of and assisted in the kidnapping and concealment of BIGGERS children.LARRY LAWRENCE and NORRIS LAWRENCE used a home daycare named "JEANS PLACE" to disguise a child trafficking ring. JEANS PLACE was used to sex traffic, rape, abuse, kidnap, and conceal BIGGERS children. LARRY LAWRENCE, NORRIS LAWRENCE, WILLIAMS, and HUETT kidnapped BIGGERS and BIGGERS siblings from CARLE HOSPITAL.
399. Their savage acts of rape and the violent kidnappings were premeditated in nature.
400. NORRIS LAWRENCE informed BIGGERS that she would be raped and that someone else would be raising her children years before the rapes and kidnappings occurred. When BIGGERS went to college, NORRIS LAWRENCE confessed to BIGGERS that she had been kidnapped" in the hallway of Carle Hospital".
401. October 10th 2019 M.F. and Z.S. were kidnapped from New York City and taken out of state by airplane. XAVIER FULTON, EPHRAM SIMS, MIKAELA TRAMELL, and ASHLEY FULTON committed the kidnapping and broadcast the kidnapping on Facebook.
402. MIKAELA TRAMMELL and ASHLEY FULTON are not biologically related to M.F. or Z.S. whatsoever.
403. After kidnapping M.F. from New York, ASHLEY then went to a COOK COUNTY judge and obtained a fraudulent Order of Protection against BIGGERS and put M.F.'S name on the Order.
404. CHICAGO PUBLIC SCHOOLS, AARON BROWN, and RUFINA BROWN allowed M.F. to be kidnapped when they violated BIGGERS custody order and protective Order she presented to them in December of 2019. CHICAGO PUBLIC SCHOOL allowed ASHLEY FULTON to kidnap M.F. for the second time while BIGGERS waited for M.F. in the school lobby. CHICAGO PUBLIC SCHOOLS are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
405. JACKSONVILLE SCHOOL DISTRICT 117 , CYNTHIA HURST, and ED WAINSCOTT unlawfully concealed BIGGERS on behalf of the criminal enterprise after she was kidnapped. JACKSONVILLE SCHOOL DISTRICT 117 is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children from 1988-until present day.
406. ILLINOIS SCHOOLL FOR THE DEAF is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
407. On October 8th 2019, NEW YORK CITY ACS and the NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES joined the conspiracy to kidnap M.F. and Z.S.. NEW YORK CITY ACS is responsible for the

kidnappings of M.F. and Z.S. from New York as they willfully and intentionally violated BIGGERS custody and protective orders for the children and gave M.F. and Z.S. away to the kidnappers without involving any New York Judge.

408. NEW YORK CITY ACS and THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES intentionally assisted the criminal enterprise in the conspiracy to kidnap M.F. and Z.S.. They were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
409. TEXAS CHILD PROTECTIVE SERVICES ordered NEW YORK ACS to kidnap M.F. and Z.S. from New York. They are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
410. From 2020 until present day THE ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES ignored the kidnappings and swept the kidnappings under the rug when BIGGERS opened investigations with their office. They are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
411. From November 2019 up until present day; THE NEW YORK FBI, the CHICAGO FBI, the EL PASO FBI, and FBI Agent CURTIS D. SOUTH participated in and concealed the kidnappings of BIGGERS children. BIGGERS made numerous reports with the FBI field offices in El Paso, Chicago, and New York.
412. Instead of conducting a proper investigation, the FBI told BIGGERS to “stop calling”. The FBI also drafted knowingly false reports and asserted that BIGGERS was previously “wanted “ for Kidnapping when no evidence of their accusation existed. The FBI is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
413. At 9:00 pm in December of 2019 LIONEL JEAN BAPTISTE trespassed on the Cook County Courthouse and kidnapped M.F. in direct violation of custody and protective orders. BAPTISTE is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
414. On October 8th 2019 Judge YAHARA GUTIERREZ ordered the kidnappings of M.F. and Z.S. from New York. GUTIERREZ is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, participated in the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
415. PAULA WHITE CAIN worked with KURT ANGLE and HEATH MILLER to orchestrate the October 2019 kidnapping of M.F. and Z.S.. WHITE CAIN impersonated Judge GUTIERREZ to kidnap M.F. and Z.S.. WHITE-CAIN is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, participated in the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
416. DETECTIVE ANTHONY CORONA of the EL PASO POLICE DEPARTMENT initiated an investigation into the kidnapping of M.F. in 2020. CORONA found that M.F. had been kidnapped and initiated the case. Next, CORONA disappeared and returned refusing to pursue charges. CORONA is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
417. On October 8th 2019, ALYSSA NAVA ordered the kidnapping of BIGGERS, M.F. and Z.S. from BRIGHTER TOMORROWS domestic violence shelter. NAVA then ordered all law enforcement to not enforce BIGGERS custody and protective Orders. NAVA is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.

418. JAIME ESPARZA, ALYSSA NAVA, ASHLEY MARTINEZ, and YVONE ROSALES orchestrated and ordered the kidnapping of BIGGERS, M.F., and Z.S.. These Defendants are responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
419. STAN BERNSTEIN raped BIGGERS while she was pregnant with M.F. STAN is responsible for the October 21st 2011 kidnappings and the conspiracy to kidnap M.F.'s siblings because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
420. THE EL PASO POLICE DEPARTMENT refused to intervene in the kidnappings even though the children were kidnapped from New York City and then taken to El Paso. THE EL PASO POLICE DEPARTMENT is liable for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
421. THE UNITED STATES MARSHAL SERVICE intentionally failed to intervene in the October 2019 kidnapping of the Plaintiffs. THE UNITED STATES MARSHAL SERVICE is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
422. THE NEW YORK POLICE DEPARTMENT intentionally and willfully refused to enforce the Plaintiffs child custody and protective Orders to assist the criminal enterprise in the kidnappings. THE NYPD is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
423. THE SHIRLEY NEW YORK POLICE DEPARTMENT, SHIRLEY PD OFFICER 1, SHIRLEY PD OFFICER 2, and DETECTIVE GREG MILLER kidnapped the Plaintiffs from BRIGHTER TOMORROWS domestic violence shelter on October 8th 2019. The SHIRLEY POLICE DEPARTMENT refused to correct their error or accept a missing person's report for the kidnapped children. When BIGGERS went to the station to make reports, Officer O'SHAUGNUSSEY altered BIGGERS report to reflect statements and representations that she did not make. THE SHIRLEY NEW YORK POLICE DEPARTMENT not only failed to intervene in the kidnappings; but they audaciously obstructed justice and tampered with evidence. THE SHIRLEY PD is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
424. BRIGHTER TOMORROWS domestic violence shelter is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. BRIGHTER TOMORROWS breached the Plaintiffs crime victims rights and their confidentiality by allowing the SHIRLEY NEW YORK POLICE DEPARTMENT to enter the shelter and kidnap them.
425. THE YWCA PUEBLO is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
426. The CENTER AGAINST SEXUAL AND FAMILY VIOLENCE responsible for the October 2019 kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
427. OUISA DAVIS accepted BIGGERS family law case with the intent to have BIGGERS falsely imprisoned and to have M.F. and Z.S. kidnapped. OUISA is responsible for the kidnappings and the conspiracy to kidnap because she aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
428. From 1999 -2001 SUE SINCLAIR concealed the kidnapping of BIGGERS and her newborn children. SINCLAIR is responsible for the kidnappings and the conspiracy to kidnap because they were aware

of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.

429. SANDRA LAWRENCE participated in the kidnapping of BIGGERS from birth. Subsequently, SANDRA worked with SUE SINCLAIR and LARRY LAWRENCE to conceal the kidnappings of BIGGERS newborn children in 2000. SANDRA is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
430. BIGGERS was a full scholarship athlete at ILLINOIS CENTRAL COLLEGE when her children were kidnapped by being ripped from her womb. BIGGERS was still bleeding from the assault and kidnapping as she attended her college volleyball practices. SUE SINCLAIR and her wife were aware of the kidnapping. ILLINOIS CENTRAL COLLEGE is responsible for the kidnappings and the conspiracy to kidnap because their faculty and staff were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
431. PRISON TRANSPORT SYSTEMS kidnapped BIGGERS from RIVERHEAD CORRECTIONAL FACILITY November of 2019. PTS is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. BIGGERS asked PRISON TRANSPORT SYSTEMS to set her free after they kidnapped her. They refused to set BIGGERS free, brandished weapons at her, and stole her court orders of protection and custody of her children that she had on her person.
432. ISAAC WRIGHT JR. and SANDRA WRIGHT kidnapped the Plaintiffs and her children from 1998-present day. ISAAC WRIGHT JR. orchestrated the October 21st 2011 kidnappings, and the October 8th 2019 kidnappings SANDRA WRIGHT kidnapped BIGGERS children by violently ripping them from her womb in 2000. SANDRA and ISAAC participated in the 2019 kidnappings of BIGGERS , M.F. and Z.S. from BRIGHTER TOMORROWS. SANDRA and ISAAC are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
433. TIME SQUARE CHURCH is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and are currently unlawfully concealing the location of the kidnapped children.
434. TIM DELINA is the pastor of TIMES SQUARE CHURCH in New York City. DILENA kidnapped BIGGERS children in 2000 by posing as a hospital nurse in Peoria , Illinois and ripping the children from her womb. DELINA boasted about the kidnaping from the pulpit at TIMES SQUARE CHURCH in 2022. DELINA is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, participated in the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
435. TD JAKES is responsible for BIGGERS and the kidnappings of her children in 2000, 2011, and 2016. JAKES is liable for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
436. EDWARD MCGEE is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
437. DIANA WASHINGTON responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
438. RAFAEL MORALES orchestrated the October 21st 2011 kidnappings and the October 8th 2019 kidnappings of the Plaintiffs. MORALES is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.

439. MELINDA ELAM, ROSHEEMA DIXON, and FAITH ELAM are responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
440. ROSHEEMA DIXON is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children
441. TARA CARISSA HODGES is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children from 2000- present day.
442. JOEL ELAM stalked and kidnapped BIGGERS children in 2000, 2011 and 2016. JOEL is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children
443. PAULA WHITE orchestrated the kidnapping of BIGGERS children October 10th 2019 from New York City. PAULA is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children from 2000- present day.
444. ARYN WILLIAMS VANN is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children from 2000- present day.
445. CHICAGO LEGAL AID is responsible for the October 2019 kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
446. THE MANHATTAN FAMILY JUSTICE CENTER and OLIVIA WILSON refused to assist BIGGERS with rescuing her kidnapped children after conducting an intake in 2022. THE MANHATTAN FAMILY JUSTICE CENTER is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
447. TIMOTHY MCGILL stalked BIGGERS from 2000- 2022 and also kidnapped BIGGERS children. He is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, participated in the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children from 2000- present day.
448. IMPACT WRESTLING , KURT ANGLE, and DIXIE CARTER orchestrated the kidnappings of BIGGERS children. KURT ANGLE stalked BIGGERS from 2000-Present day, raped her and kidnapped her children. KURT ANGLE had the support of DIXIE CARTER in his rapes and kidnappings. These Defendants are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, participated in the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children from 2000- present day.
449. KAREN SMEDLY aka KAREN JARRETT stole BIGGERS eggs and kidnapped her children in 2000, 2004,2011,2016 and 2019. KAREN is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, participated in the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
450. EPHRAM SIMS orchestrated the kidnapping of BIGGERS children May 17th 2016. SIMS kidnapped M.F. and Z.S. October 8th 2019. EPHRAM SIMS is not M.F. or Z.S.'S biological father. SIMS responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MIKALEA TRAMMELL assisted SIMS in the kidnappings and unlawful concealment of BIGGERS children.

451. ASHLEY FULTON kidnapped M.F. and Z.S. October 10th 2019. ASHLEY has unlawfully concealed BIGGERS kidnapped children who were kidnapped in 2011. ASHLEY is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
452. XAVIER FULTON kidnapped M.F. and Z.S. October 10th, 2019 from New York City
453. ALMA FULTON kidnapped M.F.'S sibling October 21st 2011. Next she kidnapped M.F. on or about October 10th of 2019. ALMA is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ALMA kidnapped children from BIGGERS womb.
454. GLEN FULTON kidnapped M.F.'S siblings on October 21st, 2011. GLEN then kidnapped M.F. and Z.S. again on October 10th 2019. GLEN has orchestrated and executed multiple kidnappings of BIGGERS children. GLEN responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
455. AMANDA FULTON and CODY WILSON kidnapped M.F. from the Water Tower mall December 2019. AMANDA assisted ALMA FULTON, XAVIER FULTON and GLEN FULTON in kidnapping M.F.'s siblings from Carle Hospital in 2011 , and has unlawfully concealed the kidnapped children up until present day.
456. BRITTNEY FULTON kidnapped BIGGERS child in2011. BRITTNEY unlawfully concealed the kidnapped M.F. from October 2019-present day. BRITTNEY is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. BRITTANY kidnapped children from BIGGERS womb.
457. BRITTNEY WINES kidnapped M.F.'S sister October 21st 2011. BRITTNEY is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
458. JODI REBER kidnapped BIGGERS child OCTOBER 21st 2011. JODI is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JODI kidnapped children from BIGGERS womb.
459. JENNIPHER ADKINS stalked and kidnapped children from BIGGERS womb October 21st 2011 and may 17th 2016. JENNIPHER is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JENNIPHER kidnapped children from BIGGERS womb.
460. GLADYS MATTHEWS participated in the kidnapping of the Plaintiff's children. GLADYS is responsible for the October 21st 2011 kidnappings and the conspiracy to kidnap as she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. GLADYS kidnapped children from BIGGERS womb.
461. NATALIE KATHERINE NEIDHART stole BIGGERS eggs and kidnapped BIGGERS children October 2011,and May 2016. NATALIE is responsible for the kidnappings and the conspiracy to kidnap because she aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. NATALIE kidnapped children from BIGGERS womb.
462. SHELLY MARTINEZ participated in the kidnapping of the Plaintiffs children in October of 2011 and May of 2016. SHELLY is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
463. KIA STEVENS aka "Dr. VEDROY" kidnapped BIGGERS children by impersonating a physician and ripping BIGGERS children from her womb on May 17th, 2016. KIA also participated in the October

2011 kidnappings. KIA is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.

464. MICHELLE LYNCH stole BIGGERS eggs and kidnapped her children . LYNCH is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LYNCH kidnapped children from BIGGERS womb.
465. MECHELLE BAILEY MOORE stole BIGGERS eggs and kidnapped her children October of 2011. MECHELLE is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MECHELLE kidnapped children from BIGGERS womb.
466. LOLITA NEWMAN stole BIGGERS eggs and kidnapped her children in 2000. LOLITA is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LOLITA kidnapped children from BIGGERS womb.
467. THEOLA HAGGER kidnapped BIGGERS children and her eggs October 2011 and May of 2017. When made plain to HAGGER that she was in unlawful possession of BIGGERS children, she deactivated her law license and withdrew from BIGGERS family law case. THEOLA is responsible for the kidnappings and the conspiracy to kidnap because was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. THEOLA kidnapped children from BIGGERS womb.
468. HEATH WALLACE MILLER, or HEATH MILLER kidnapped BIGGERS children in 2000, October 21st 2011, May 17th 2016 and again in 2019. HEATH is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. HEATH kidnapped children from BIGGERS womb.
469. EL PASO MOTHERS AGAINST FAMILY COURT ABUSE, KRISTEN MCGRUBB, and RHONDA MCPETRIDGE are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
470. Attorney STEPHANIE JAMES and TEXAS RIO GRANDE LEGAL AID are responsible for the October 2019 kidnappings as she accepted BIGGERS family law case with the intent of having M.F. and Z.S. kidnapped. JAMES was aware the kidnappings were about to happen, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
471. THE EL PASO TEXAS 65TH DISTRICT JUDICIAL COURT orchestrated to October 2019 kidnapping of the Plaintiffs. THE 65TH DISTRICT JUDICIAL COURT is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
472. The EL PASO 409TH DISTRICT COURT by Judge SAMUEL 'SAM' MEDRANO orchestrated the kidnapping of BIGGERS, M.F. and Z.S. MEDRANO and the EL PASO 409th DISTRICT COURT are responsible for the kidnappings and the conspiracy to kidnap the Plaintiffs October 8th of 2019. The 409th orchestrated the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
473. BIGGERS former college roommate Judge JESUS RODRIGUEZ ran for Judge in El Paso with the intent of kidnapping M.F.. In 2021 RODRIGUEZ signed Orders affirming that M.F. was kidnapped, then instructed law enforcement to not enforce the Order. RODRIGUEZ is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.

474. The actions of Judge JESUS RODRIGUEZ make COUNTY COURT AT LAW 5 responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
475. ALFREDO ALDERTE is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
476. MEGAN PECHECCO is responsible for the 2000 kidnappings of BIGGERS children. MEGAN PECHECCO took BIGGERS to the facility where her unborn children were ripped from her womb. MEGAN participated in and concealed the ripping of BIGGERS children from her womb by TIM DELINA, JOHN HUETT, and DORIS HUETT WILLIAMS. MEGAN is liable for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
477. JOHN BUCMILLER AND ASSOCIATES are responsible for the December 2019 kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
478. Former UNITED STATES CONGRESSMAN ROBERT BETO O'ROURKE stalked the Plaintiffs from El Paso to New York and had them kidnapped from BRIGHTER TOMORROWS domestic violence shelter. O'ROURKE is liable responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
479. BENITO TORRES stalked the Plaintiffs and had them kidnapped from BRIGHTER TOMORROW'S domestic violence shelter October 8th, 2019. TORRES is liable responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
480. VERONICA LERMA was BIGGERS attorney during the kidnappings. LERMA stole BIGGERS eggs and assisted in the October 8th 2019 kidnappings. LERMA is liable responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
481. On October 21st 2011, XAVIER FULTON and HEATH MILLER cut BIGGERS abdomen open without her knowledge or consent while she was unconscious. FULTON and MILLER also stole BIGGERS eggs from her body October 21ST 2011. FULTON and MILLER then kidnapped BIGGERS babies from her womb and only gave her one child. Next, FULTON, HUETT, WILLIAMS, ROBINSON, and MILLER conspired with KIA STEVENS aka DR. QRANA VEDROY and kidnapped BIGGERS children by ripping them from her womb on May 17th, 2016 at WILLIAM BEAUMONT ARMY MEDICAL CENTER.
482. XAVIER FULTON lied to the FBI about the kidnappings and attempted to frame BIGGERS for crimes to divert attention away from his criminal acts. The FBI was fully aware that FULTON was lying and then went on to assist him in concealing the kidnapped children. FULTON, HUETT, WILLIAMS, ROBINSON and MILLER orchestrated and executed the kidnappings of M.F. and Z.S. from New York City in 2019.
483. ISMAEL PEASE assisted XAVIER FULTON in the 2019 kidnappings. PEASE is liable responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
484. RICHARD ARABIGT kidnapped BIGGERS children by stealing her eggs without her knowledge or consent during a breast augmentation surgery in his office in 2004.
485. JOHN DOE 1-100 are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.

486. JANE DOE 1-100 are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.

CLAIM FOR RELIEF 7:
DELIBERATE FABRICATION OF EVIDENCE
(42 U.S.C. § 1983)

487. Plaintiffs hereby reincorporate and re-allege the preceding paragraphs of this complaint as if fully re-written herein.
488. ALYSSA NAVA, CHARLES VERA, ASHLEY MARTINEZ, JAIME EZPARZA, ANGIE BARILL, SAMUEL 'SAM' MEDRANO, and MARK SPINN of the EL PASO COUNTY DISTRICT ATTORNEYS office knowingly and intentionally created and pursued a fictional arrest warrants and fictitious felony indictments against BIGGERS.
489. EL Paso County Sheriff RICHARD WILES and DETECTIVE CHARLES VERA produced a fictional felony arrest warrant that does not contain a signature of a Judge finding probable cause. The EL PASO POLICE DEPARTMENT allowed BIGGERS to be arrested off of a Warrant that they failed to secure. WILES, THE EL PASO POLICE DEPARTMENT, and THE EL PASO DISTRICT ATTORNEY'S OFFICE used the non-existent arrest warrant to have BIGGERS placed on the Crime Stoppers Most Wanted list for "interference with child custody".
490. At all times BIGGERS former co-worker Assistant District Attorney ALYSSA NAVA was aware that no Judge signed a warrant for BIGGERS arrest, that no grand jury met, and that no grand jury indicted BIGGERS. NAVA then decided to create her own grand jury indictment and order that BIGGERS be falsely arrested and extradited by van from New York to El Paso. At all times NAVA was aware that no Judge signed any warrant for BIGGERS arrest, that no grand jury met, and that no grand jury had indicted BIGGERS. At all times MARTINEZ was aware that no Judge signed any warrant for BIGGERS arrest, that no grand jury met, and that no grand jury indicted BIGGERS.
491. NAVA, MARTINEZ, SPINN and the El Paso County District Attorneys office had multiple opportunities to correct their error, however they instead chose to display reckless disregard for the integrity of the Court and the law. As District Attorney, ESPARZA willfully, intentionally, and knowingly facilitated and supported the creation of the fictitious grand jury indictment. ESPARZA refused to correct the error and maliciously pursued the false imprisonment of BIGGERS. ESPARZA supported the criminal fabrications of evidence by NAVA, SPINN, and MARTINEZ; his assistant district attorneys.
492. In like manner, ROSALES served as El Paso District Attorney and supported the fabrication of the grand jury indictment and fictional arrest warrant against BIGGERS. As acting District Attorney ROSALES willfully, intentionally, and knowingly facilitated and supported the use and creation of fictional arrest warrants and the fictitious grand jury indictment against BIGGERS. After taking office, ROSALES had a plethora of evidence available to dismiss the fictitious case against BIGGERS. ROSALES decided to pursue the charges against BIGGERS until she was forced to resign from office for intimidation of witnesses in the El Paso mass shooting case and for her incompetency. ROSALES was then replaced in December of 2022 when Texas governor Greg Abbott hand selected BILL D. HICKS as the new El Paso County District Attorney.
493. In a similar fashion as ESPARZA and ROSALES, HICKS supported the fictional grand jury indictment, fictitious arrest warrant, and the illegal activities of NAVA, SPINN, and MARTINEZ in their unlawful pursuit of BIGGERS. BILL HICKS is currently attempting to kidnap BIGGERS from New York City by false arrest. Up until the filing of this suit, ESPARZA, ROSALES, HICKS, NAVA, MARTINEZ, and SPINN have taken no corrective action and have refused to dismiss the fictitious criminal case against BIGGERS.

494. ESPARZA, ROSALES, HICKS, NAVA, MARTINEZ, SPINN, and WILES violated the Plaintiffs 14th Amendment rights as they fabricated arrest warrants and created fictitious felony indictments for “aggravated kidnapping” against BIGGERS. ESPARZA, ROSALES, HICKS, NAVA, MARTINEZ, SPINN, and WILES intentionally fabricated evidence to falsely imprison BIGGERS, to assist in the kidnapping BIGGERS and her children to advance ANGLE’S criminal enterprise. THE MANHATTAN DISTRICT ATTORNEY’S OFFICE knowingly and intentionally used the fictitious and fabricated evidence to falsely imprison BIGGERS at RIKERS ISLAND in October of 2022.
495. The above named defendants continued their investigation of BIGGERS despite the fact that they were fully aware that BIGGERS was innocent. These Defendants showed deliberate indifference to BIGGERS innocence and have continued to attempt to criminally prosecute BIGGERS. The techniques used by the El Paso County District attorneys office were so coercive and abusive that they would shock the conscience of any reasonable person.
496. These Defendants were fully aware that their tactics would yield false information.
497. There is a clearly established constitutional due process right not to be subjected to criminal charges on the basis of false evidence created by the government. ***Ninth Circuit Devereaux vs Abbey***

CLAIM FOR RELIEF 8:
BRADY VIOLATION AND VIOLATION OF THE MICHAEL MORTON ACT
(42 U.S.C. § 1983)

498. Prosecution teams in Manhattan and in El Paso conspired to commit violations of the Brady Rule and the Michael Morton Act by failing to turn over exculpatory evidence to the Court and Defense counsel.
499. The evidence that THE MANHATTAN DISTRICT ATTORNEY’S OFFICE and the EL PASO DISTRICT ATTORNEY’S office has failed reveal is that BIGGERS was never charged with any crime, that no grand jury ever met, and that the indictment is completely fictitious.
500. In October of 2022 the MANHATTAN DISTRICT ATTORNEY’S OFFICE violated the Brady Rule and the Michael Morton act when they became aware that BIGGERS was never indicted or charged with any crime, yet failed to inform the Court of these facts.
501. THE MANHATTAN COUNTY DISTRICT ATTORNEYS OFFICE was given the opportunity to release BIGGERS, yet chose to assist the EL PASO COUNTY DISTRICT ATTORNEY’S OFFICE in maliciously prosecuting and falsely imprisoning BIGGERS at RIKERS ISLAND.
502. ALYSSA NAVA violated the Brady act and the Michael Morton act as she was in possession of exculpatory evidence, did not provide this evidence to the defense, then knowingly and intentionally continued to pursue the false imprisonment of and wrongful conviction against BIGGERS.
503. The evidence that was concealed was material in nature, favorable to BIGGERS, and impeaching in nature of the State’s witnesses. The suppression of the evidence was willful and intentional and prejudice did ensue.
504. NAVA was at all times aware that BIGGERS was never indicted and that no warrant for her arrest was ever issued.
505. MARK WESLEY SPINN, or “MARK SPINN” violated the Brady act and the Michael Morton act as he was in possession of exculpatory evidence, did not provide this evidence to the defense, then knowingly and intentionally continued to pursue the false imprisonment of and wrongful conviction against BIGGERS. The evidence that was concealed was material in nature, favorable to BIGGERS, and impeaching in nature of the State’s witnesses. The suppression of the evidence was willful and intentional and prejudice did ensue.

506. SPINN was at all times aware that BIGGERS was never indicted by any Texas Grand Jury and that no judge ever issued any warrant for BIGGERS arrest.
507. ASHLEY MARTINEZ is actively violating the Brady act and the Michael Morton act as she is in possession of exculpatory evidence, did not provide this evidence to the defense, then knowingly and intentionally continued to pursue the false imprisonment of and wrongful conviction against BIGGERS. The evidence that was concealed was material in nature, favorable to BIGGERS, and impeaching in nature of the State's witnesses. The suppression of the evidence was willful and intentional and prejudice did ensue.
508. MARTINEZ was at all times and is currently aware that BIGGERS was never indicted by any Texas Grand Jury and that no judge ever issued any warrant for BIGGERS arrest.
509. MARTINEZ is currently pursuing a wrongful conviction and the false imprisonment of BIGGERS without warrant, or indictment.
510. JAIME ESPARZA violated the Brady act and the Michael Morton act as she was in possession of exculpatory evidence, did not provide this evidence to the defense, then knowingly and intentionally continued to pursue the false imprisonment of and wrongful conviction against BIGGERS. The evidence that was concealed was material in nature, favorable to BIGGERS, and impeaching in nature of the State's witnesses. The suppression of the evidence was willful and intentional and prejudice did ensue.
511. ESPARZA was at all times aware that BIGGERS was never indicted by any Texas Grand Jury and that no judge ever issued any warrant for BIGGERS arrest.
512. YVONNE ROSALES violated the Brady act and the Michael Morton act as he was in possession of exculpatory evidence, did not provide this evidence to the defense, then knowingly and intentionally continued to pursue the false imprisonment of and wrongful conviction against BIGGERS. The evidence that was concealed was material in nature, favorable to BIGGERS, and impeaching in nature of the State's witnesses.
513. The suppression of the evidence was willful and intentional and prejudice did ensue.
514. ROSALES was at all times aware that BIGGERS was never indicted by any Texas Grand Jury and that no judge ever issued any warrant for BIGGERS arrest.
515. BILL HICKS is currently violating the Brady Rule and the Michael Morton act as he is in possession of exculpatory evidence, did not provide this evidence to the defense, then knowingly and intentionally continued to pursue the false imprisonment of and wrongful conviction against BIGGERS. The evidence that was concealed was material in nature, favorable to BIGGERS, and impeaching in nature of the State's witnesses. The suppression of the evidence was willful and intentional and prejudice did ensue.
516. HICKS is currently pursuing a wrongful conviction and false imprisonment of BIGGERS as he is aware that BIGGERS was never indicted by any Texas Grand Jury and that no judge ever issued any warrant for BIGGERS arrest.

CLAIM FOR RELIEF 9 :
DELIBERATE AND RECKLESS SUPPRESSION OF EVIDENCE
(42 U.S.C. § 1983)

517. Plaintiff hereby re-incorporates and re-alleges the each paragraph of this complaint as if fully re-written herein.

518. In October of 2022 THE MANHATTAN COUNTY DISTRICT ATTORNEY'S OFFICE deliberately and recklessly suppressed evidence from the Court that BIGGERS was never charged or indicted for "Aggravated Kidnapping" or "Custodial Interference".
519. THE MANHATTAN DISTRICT ATTORNEY'S OFFICE conspired with THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE to suppress this evidence and falsely imprison BIGGERS.
520. ALYSSA NAVA,RICHARD WILES, MARK SPINN, JAIME ESPARZA, YVONNE ROSALES, BILL HICKS,SAMUEL 'SAM' MEDRANO, ANGIE BARILL, ASHLEY MARTINEZ of the El Paso County District Attorneys office deliberately and recklessly suppressed evidence to conceal their brazen acts of fraud upon the Court. These Defendants to this day are concealing the fact that BIGGERS had legal custody of the child that they claim she kidnapped.
521. The above named defendants have shown deliberate indifference for BIGGERS 14th amendment rights and have rabidly pursued a wrongful conviction of BIGGERS by using fictional indictments and fictitious warrants created by their office.
522. NAVA, WILES,SPINN, ESPARZA, ROSALES,HICKS, MEDRANO, BARILL and MARTINEZ knowingly and intentionally created these fictional charging instruments for their shared goal of kidnapping BIGGERS and falsely imprisoning her.
523. The El Paso District Attorneys office and its prosecutors have had ample time and opportunity to correct their error, yet they have chosen to show willful indifference for the law and go to war against the United States Constitution to divert attention from their ongoing criminal enterprise.
524. The HENRY COUNTY DISTRICT ATTORNEYS office showed a willful and deliberate indifference to the facts of a " Hit and Run" case they pursued against BIGGERS. With full knowledge that BIGGERS was the victim of being rear ended in an attempted vehicular homicide, the HENRY COUNTY DISTRICT ATTORNEY and the MCDONOUGH POLICE DEPARTMENT falsely imprisoned BIGGERS , bullied and intimidated her, and pursued a frivolous conviction against her.

CLAIM FOR RELIEF 10:

42 USC 1983 VIOLATION: EXCESSIVE FORCE

(42 U.S.C.1983)

AS AGAINST: THE EL PASO COUNTY SHERIFF, THE EL PASO TEXAS CONSTABLES OFFICE, THE EL PASO POLICE DEPARTMENT,THE NEW YORK POLICE DEPARTMENT, JOHN DOE 1-100 and JANE DOE 1-100...

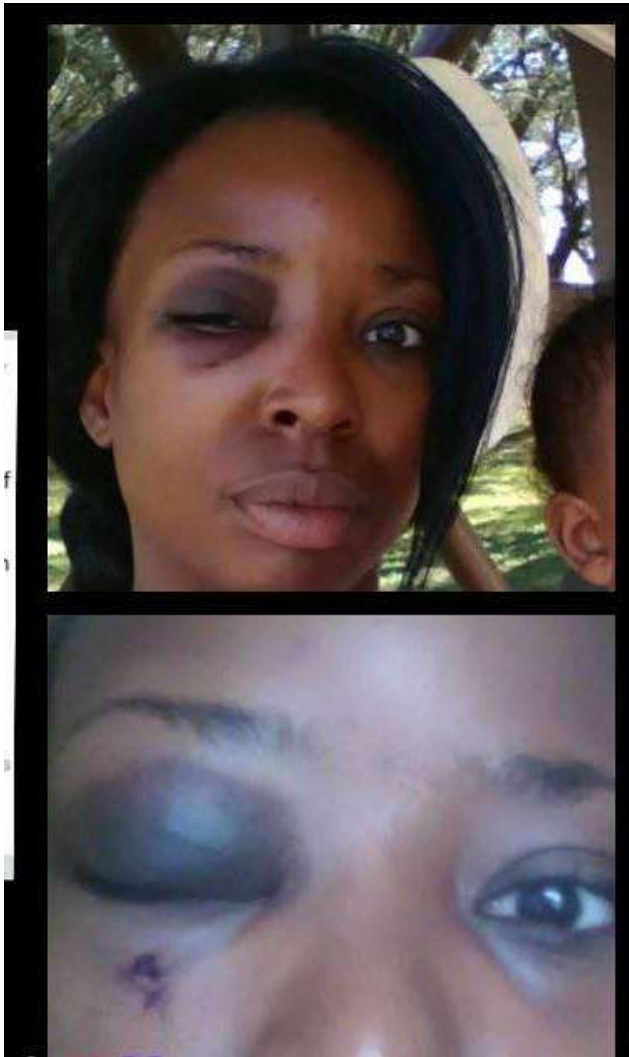
525. The EL PASO COUNTY SHERRIF used excessive force against BIGGERS when they conducted an unlawful stop of her vehicle by jumping into BIGGERS car, putting a gun to her head, and violently ripping her from the vehicle. There was no probable cause for the traffic stop. The El Paso County Constable used excessive force when they violently ripped the Plaintiff from her property as they were assisting in a burglary and unlawful dispossession of her residence.
526. The Shirley New York Police Department used excessive force against the Plaintiffs when they entered the Brighter Tomorrows domestic violence shelter, handcuffed, and kidnapped them.
527. The NEW YORK POLICE DEPARTMENT and THE UNITED STATES MARSHALL service used excessive force when the handcuffed and kidnapped BIGGERS from her apartment without a valid warrant or probable cause December of 2022.

CLAIM FOR RELIEF 11:

BATTERY

(42 U.S.C. § 1983)

528. Plaintiffs hereby re-allege and reincorporate all of the paragraphs in this complaint.
529. These Defendants battered the Plaintiffs as they made unlawful and unpermitted contact with the Plaintiffs person and property in a harmful and offensive manner.
530. The Defendants actions cause emotional harm, harm to the Plaintiffs person, and harm to the Plaintiffs body.
531. The Plaintiffs injuries can be traced back to the Defendants actions.
532. The named Defendants possessed the mens rea to commit the offense of Battery against the Plaintiffs.
533. XAVIER FULTON and HEATH MILLER battered BIGGERS when they cut open her womb and kidnapped her children without her knowledge or consent.
534. KIA STEVENS battered BIGGERS when he disguised himself as "DR. VEDDY" then filmed himself pulling children from BIGGERS womb without BIGGERS knowledge or consent. STEVENS also mutilated BIGGERS reproductive organs without her knowledge or consent.
535. EPHRAM SIMS, ROCKELL VAUGHN, KRISTEN EUBANKS, and NICOLE RACZYNSKI battered BIGGERS when they struck her in the face with the intent to cause bodily harm. BIGGERS was left disfigured by the battery. The injury below was cause by EPHRAM SIMS.



536. SHANNON SPURILL and MIKE KNOX battered BIGGERS when they attempted to murder BIGGERS by breaking her neck.
537. HEATH WALLACE MILLER battered BIGGERS when he swung a broomstick and struck BIGGERS in her abdomen as if he were swinging a baseball bat. He also committed battery against BIGGERS when he burned her skin off with acid while she was asleep.
538. The NYPD, PRISON TRANSPORT SERVICES, the UNITED STATES MARSHALL SERVICE, and the SHIRLEY PD battered BIGGERS when they handcuffed BIGGERS without any warrant or probable cause.
539. The EL PASO COUNTY SHERIFF battered BIGGERS when they put a gun to her head, ripped her out of her vehicle, and violently handcuffed her without probable cause or her consent.
540. SHANE ONEAL aka STAN BERNSTEIN battered BIGGERS when he drugged and raped her while she was pregnant with M.F. and M.F.'s siblings.
541. JOHN HUETT, JOHNNIE COCHRAN and DORIS HUETT WILLIAMS, battered BIGGERS when they drugged her, raped her, then violently ripped her children from her womb without her knowledge or consent.
542. JOHN HUETT, LARRY LAWRENCE, and NORRIS LAWRENCE battered BIGGERS when they repeatedly beat her with belts, sticks, switches, and their hands from birth into adulthood.
543. KURT ANGLE battered BIGGERS when he repeatedly punched her in the face, bit a hole through her nose, knocked out her teeth with punches, drugged and raped her in her sleep.
544. The EL PASO COUNTY CONSTABLE battered BIGGERS when they violently handcuffed and falsely arrested BIGGERS on her own property to assist in a burglary in process.
545. The UNITED STATES POSTAL SERVICE battered BIGGERS when their employee grabbed BIGGERS and violently ripped BIGGERS cell phone from her hand while she was at the customer service window.

CLAIM FOR RELIEF 12:

**DEPRIVATION OF CIVIL RIGHTS UNDER THE COLOR OF LAW
(42 U.S.C. 1983)**

AS AGAINST: LAURA TAYLOR SWAIN, THE MANHATTAN DISTRICT ATTORNEYS OFFICE, NEW YORK CITY ACS, THE EL PASO POLICE DEPARTMENT, THE EL PASO COUNTY SHERIFF, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE NEW YORK POLICE DEPARTMENT, THE US MARSHALLS SERVICE, THE FBI, YAHARA GUTIERREZ, THE STATE OF NEW YORK, THE STATE OF TEXAS, THE STATE OF ILLINOIS. THE HAMLET OF SHIRLEY, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE CHICAGO POLICE DEPARTMENT, THE COOK COUNTY SHERIFF, EACH STATE ACTOR NAMED IN THE ENTIRETY OF THIS COMPLAINT, EACH STATE ACTOR NAMED IN THE ENTIRETY OF THIS COMPLAINT, JOHN DOE 1-100, AND JANE DOE 1-100

546. The Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint.
547. The Plaintiffs also reincorporate each paragraph of this complaint as if fully re-written herein.
548. The above and following named defendants deprived the Plaintiffs of their civil rights by intentionally and knowingly making multiple false arrests, falsely imprisoning the Plaintiffs, issuing fictitious warrants, refusing to enforce custody & domestic violence protective orders, allowing the Plaintiffs to be kidnapped, and participating in the kidnapping and prolonged unlawful concealment of BIGGERS children.

549. SDNY Judge LAURA TAYLOR SWAIN is depriving the Plaintiffs of their civil rights under the color of law by refusing to recuse herself from the Plaintiffs case . LAURA TAYLOR SWAIN and BIGGERS were roommates while BIGGERS was a student at Florida State University. SWAIN dated BIGGERS boyfriend while they were still roommates. LAURA TAYLOR SWAIN has also entered into intimate relationships with BIGGERS family members and multiple co-defendants named in this case. Furthermore, SWAIN depriving the Plaintiffs of their civil rights as she is practicing law from the bench and acting as a defense attorney for her co-conspirators. There is also reason to believe that LAURA TAYLOR SWAIN is/has been in possession of BIGGERS kidnapped children. LAURA TAYLOR SWAIN has also communicated that she will deny the Plaintiffs their right to a jury trial as has been demanded , and instructed the Clerk to enter a judgement if BIGGERS does not remove defendants that she identified in this case. Then willingness of LAURA TAYLOR SWAIN to deprive the Plaintiffs of their civil rights has given each of her co-defendants the confidence to go to war against the United States Constitution as well.
550. ANGIE BARILL, JAIME EZPARZA, SAMUEL 'SAM' MEDRANO, BILL HICKS, ASHLEY MARTINEZ, YVONNE ROSALES, MARK SPINN, RICHARD WILES, AND ALYSSA NAVA deprived the Plaintiff of her civil rights under the color of law by falsifying and fabricating a fictitious felony indictment and a fictitious felony warrant for the BIGGERS'S arrest. Fully aware that BIGGERS'S has never been charged with any crime, nor indicted for any offense, they have continued to attempt to falsely imprison her based on their fictitious and non-existent criminal charge.
551. YAHARA GUTIERREZ sat in El Paso Texas and ordered the kidnapping of M.F. and Z.S. from New York as a TEXAS CHILD PROTECTIVE SERVICES judge. When GUTIERREZ took this action she deprived BIGGERS and her children of their civil rights under the color of law.
552. Before ordering the kidnapping of BIGGERS children, GUTIERREZ abused her power and denied the plaintiffs of their civil rights including denying BIGGERS the jury that had been demanded.
553. GUTIERREZ also denied BIGGERS her right to counsel, and defaulted custody of BIGGERS child to a rapist because BIGGERS was as GUTIERREZ stated: " running late after the lunch break because she had to stop for gas" ***See Appeal and Motion For New Trial.***
554. GUTIERREZ had BIGGERS falsely imprisoned as a favor to BIGGERS ex whom GUTIERREZ was in a sexual relationship with throughout BIGGERS divorce. GUTIERREZ deprived the plaintiffs of their civil rights when she granted custody of BIGGERS child by default to SIMS who was banned from contact with BIGGERS on her children stemming from his criminal conviction for family violence.
555. NEW YORK ACS and the NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES kidnapped M.F. and Z.S. and "granted custody" of BIGGERS children to SIMS and FULTON without going before any New York judge. This action was a deprivation of the Plaintiffs civil rights under the color of law.
556. LIONEL JEAN BAPTISTE deprived the Plaintiffs of their civil rights when he refused to enforce and acknowledge BIGGERS custody order and order of protect for her and her children. BAPTISTE took the deprivation of BIGGERS civil rights to extreme levels .BAPTISTE followed up his reckless disregard of BIGGERS protective and custody orders by writing Orders to support the kidnapping of BIGGERS children and the violation of the Orders that were already in place.
557. BIGGERS former roommate Judge JESUS RODRIGUEZ violated the Plaintiffs of their civil right under the color of law when he signed Court Orders that affirm the kidnapping of BIGGERS children and ordered the return of M.F. to BIGGERS. Next RODRIGUEZ refused to enforce the Order and instructed law enforcement to not enforce the Order.
558. Judge JESUS URENDA sat as the judge presiding over BIGGERS eviction case, witnessed BIGGERS win the eviction case, issued Orders dismissing the case, and dismissed the jury. Next, without having a hearing or even a case filed; URENDA issued a Writ of Possession ordering BIGGERS and her children be removed from her home by the Constable. URENDA then had BIGGERS arrested and booked in the El Paso County Jail for trying to stop the burglary of her home. The actions of URENDA in ordering

the unlawful dispossession of BIGGERS home and then falsely imprisoning her were an audacious deprivation of BIGGERS and her childrens' civil rights under the color of law.

559. THE SHIRLEY NEW YORK POLICE DEPARTMENT entered into the Brighter Tomorrows Domestic Violence shelter and arrested BIGGERS without probable cause and without a warrant. Not only was this act the legal definition of kidnapping, this was also deprivation of BIGGERS civil rights under the color of law.
560. THE NEW YORK POLICE DEPARTMENT and the UNITED STATES MARSHALL service falsely arrested BIGGERS and had her booked into Rikers without a valid warrant and without probable cause. This action constitutes a deprivation of BIGGERS civil rights under the color of law.
561. The NYPD , THE CHICAGO POLICE DEPARTMENT, THE COOK COUNTY SHERIFF, THE LYNWOOD POLICE DEPARTMENT, The SHIRLEY NEW YORK POLICE DEPARTMENT, THE EL PASO POLICE DEPARTMENT, THE EL PASO COUNTY SHERIFF, THE FBI, and the UNITED STATES MAARSHALL SERVICE all intentionally failed to intervene when presented with evidence that BIGGERS children had been kidnapped. These Defendants intentionally and knowingly violated Court Orders and refused to enforce Court Orders to deprive the Plaintiffs of their civil rights. These Defendants also refused to take a missing persons report for BIGGERS kidnapped children.
562. JAIME ESPARZA , MARK SPINN, ALYSSA NAVA , and ASHLEY MARTINEZ deprived the Plaintiffs of their civil rights under the color of law when they instructed the El Paso Police Department and the El Paso County Sheriff to not acknowledge or enforce BIGGERS domestic violence protective orders and the custody orders for M.F. and Z.S. that SIMS and FULTON were in violation of.
563. LORI LIGHTFOOT, DEE MARGO, ERIC ADAMS, ROBERT "PAT" WHITE, and BILL DEBLASSIO violated the Plaintiffs civil rights under the color of law when they instructed their respective law enforcement agencies not to intervene in the kidnappings.
564. The refusal of these agencies to intervene and assist BIGGERS is securing her kidnapped children was a collective and extreme deprivation of the rights of BIGGERS, M.F. , and Z.S. under the color of law.
565. JOHN DOE1-100 and JANE DOE 1-100 violated the Plaintiffs civil rights under the color of law when they and their respective law enforcement agencies refused to enforce Court orders, assisted in the violation of Court Orders, and refused to intervene in the kidnapping and sex crimes committed against the Plaintiffs.
566. The MCDONOUGH POLICE DEPARTMENT , THE CITY OF MCDONOUGH, and THE HENRY COUNTY District ATTORNEYS OFFICE violated the Plaintiffs right to Due Process when they knowingly and intentionally made false arrest and completed their conspiracy by seeking a false conviction for a crime that never occurred. Furthermore, THE HENRY COUNTY PROSECUTORS OFFICE, HENRY COUNTY JUDGE 1 and the STATE OF GEORGIA violated BIGGERS due process rights when they denied her right to counsel. Instead of being given the option of a court appointed attorney, the HENRY COUNTY PROSECUTOR met BIGGERS before trial and instructed her to plead "no contest". BIGGERS stood trial for a crime that was impossible for her to commit and was forced into entering a plea for it by the STATE OF GEORGIA without being represented by an attorney.

CLAIM FOR RELIEF 13:

INVASION OF PRIVACY

42 U.S.C. 1983, 5 U.S.C. 552(b)(6) and 5 U.S.C. 552 (a)

AS AGAINST: EACH DEFENDANT NAMED IN THE ENTIERTY OF THIS COMPLAINT

567. Plaintiffs herby re-allege and reincorporate each paragraph of this complaint.
568. The Plaintiffs had a reasonable expectation to not be monitored or surveilled in the privacy of their own home.

569. Each of the named Defendants in this complaint acted as “peeping Tom’s” as they placed hidden cameras in the Plaintiffs private residence and monitored the Plaintiffs private lives without their knowledge or consent.
570. Each Defendant named in this complaint participated in the illegal wiretapping of the Plaintiffs phones and electronic devices.
571. The Defendants then used the Plaintiffs image and likeness for their own personal benefit.
572. The named Defendants in this complaint publicly revealed the Plaintiffs private information that was not of public concern an any reasonable person would find the information revealed by the Defendants as offensive.
573. The Defendants revealed highly offensive and embarrassing information about the Plaintiffs to present them in a false light.
574. This information was publicized with reckless disregard.
575. DR. QURANA VEDDOY of WILLIAM BEAUMONT ARMY MEDICAL CENTER filmed the vaginal birth of BIGGERS children and distributed the video without BIGGERS knowledge or consent.
576. JOHN HUETT,DORIS HUETT WILLIAMS, PAULA WHITE, HEATH WALLACE MILLER, LARRY LAWRENCE, XAVIER FULTON, ISAAC WRIGHT JR, EPHRAM SIMS, NORRIS LAWRENCE, EMMANUEL THOMPSON. EVAN CAMPBELL, PETULAH MARCIA WILSON, SCOTT REID , JOHN DOE 1-100 and JANE DOE 1-100 placed hidden cameras in the Plaintiffs private residence. Next, they filmed and broadcast the Plaintiffs private and personal activities including showers, sexual intercourse, and using the bathroom in their home.
577. PAULA WHITE CAIN used the unlawful recordings of BIGGERS private residence to appear as she had the gift of prophecy in church services. In fact, PAULA WHITE CAIN was spying on BIGGERS on behalf of HEATH MILLER, RANDY WHITE, JOHN HUETT, and DORIS HUETT WILLIAMS.
578. The above named Defendants and the Defendants named in each paragraph of this Complaint unlawfully intercepted, wire tapped, tracked, monitored, and stole the Plaintiffs electronic devises and redistributed their contents for their own personal gain.

CLAIM FOR RELIEF 14:

INTERFERENCE WITH PARENT CHILD RELATIONSHIP

(42 U.S.C. § 1983, 14 AMENDMENT)

AS AGAINST: XAVIER FULTON,KURT ANGLE,JOHN HUETT, DORIS HUETT WILLIAMS, YAHARA GUITIERREZ , THE 65TH DISTRICT COURT, JESUS RODRIGUEZ,EL PASO TEXAS 65TH DISTRICT COURT, SAMUEL ‘SAM’ MEDRANO, THE 409TH DISTRICT COURT, LIONEL JEAN BAPTIST,COUNTY COURT AT LAW 5 EL PASO TEXAS,TEXAS CHILD PROTECTIVE SERVICES, ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES, NEW YORK ADMINISTRATION FOR CHILDRENS SERVICES, CHICAGO PUBLIC SCHOOLS, PARKER ELEMENTARY SCHOOL, NEW YORK POLICE DEPARTMENT, SHIRLEY NEW YORK POLICE DEPARTMENT, TROY C. BROWN,OUISA DAVIS, STEPHANIE JAMES, TEXAS RIO GRANDE LEGAL AID, CHICAGO LEGAL AID,NYLAG,MARY TREW, THE CITY OF CHICAGO ILLINOIS, COOK COUNTY ILLINOIS, THE CITY OF NEW YORK, NEW YORK COUNTY, THE HAMLET OF SHIRLEY NEW YORK, THE CITY OF EL PASO, THE STATE OF TEXAS, THE STATE OF ILLINOIS, THE STATE OF NEW YORK, THE CITY OF JACKSONVILLE ILLINOIS, MORGAN COUNTY ILLINOIS, THE CITY OF URBANA ,ILLINOIS, THE CITY OF CHAMPAING ILLINOIS, CHAMPAIGN COUNTY ILLINOIS, EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT, JOHN DOE 1-100 and JANE DOE 1-100

579. Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint as if fully re-written herein. The above named Defendants interfered with the parent child relationship of the Plaintiffs for the purposes of oppression.
580. These Defendants went to war against the United States Constitution as they knowingly and intentionally violated the Due Process Clause of the United States Constitution to unlawfully separate the Plaintiffs. The named Defendants kidnapped and or assisted in the kidnapping of the Plaintiffs.

581. The above named Defendants superseded the judicial process, and kidnapped the Plaintiffs children for their own personal motives and gain. These Defendants violated the Plaintiffs custody orders and protective orders to facilitate their intentional interference with the Plaintiffs parent child relationship.
582. New York ACS and THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES interfered with the Plaintiffs parent child relationship when they assisted in the kidnapping of the children from Brighter Tomorrows domestic violence shelter.
583. There was no probable cause to remove the Plaintiffs children from her possession without Court authorization.
584. After unlawfully removing the Plaintiffs children, New York ACS and THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES intentionally failed to present the children before any New York Judge to obtain a court order for their actions.
585. New York ACS then “gave custody” of the Plaintiffs children to EPHRAM SIMS who was banned by Court order from contact with the Plaintiffs stemming from his family violence case and also “gave” BIGGERS children to XAVIER FULTON who had no legal right to the children.
586. New York ACS ignored and violated the Plaintiffs protective orders and custody orders as they endeavored to interfere with the Plaintiffs parent child relationship. They then assisted in the interstate and international abduction of the Plaintiffs children and refused to correct their error.
587. Prior to the kidnapping by New York ACS, YAHARA GUTIERREZ initiated the interference with the Plaintiffs parent child relationship when she brazenly went to war against the United States Constitution and violated the plaintiffs right to Due Process as detailed in ***Exhibit A and Exhibit B***.
588. While sitting in Texas, and after being recused from the Plaintiffs family law case; GUTIERREZ ordered the kidnapping of the Plaintiffs from Brighter Tomorrows domestic violence shelter in Shirley, New York
589. SAMUEL ‘SAM’ MEDRANO unlawfully interfered with the Plaintiffs parent child relationship when he knowingly and intentionally issued a void family court order to strip BIGGERS of her parental rights when MEDRANO is not a family court Judge. MEDRANO's order is in direct contradiction to the family Court Order that he was attempting to imprison BIGGERS for violating. MEDRANO used this void and illegal order to kidnap BIGGERS children.
590. The conduct of MEDRANO, GUTIERREZ, and NEW YORK ACS along with their co-defendants violating the Plaintiffs 14th amendment Due Process rights would shock the conscience of any reasonable person. These named Defendants intended to harm the Plaintiffs with their conduct. The Defendants identified in this count showed a deliberate indifference to the Plaintiffs right to Due Process even violating court orders to achieve completion of their wicked scheme.
591. The identified Defendants in this count unreasonably allowed harm to occur to the Plaintiffs through their illegal interference with their Parent child relationship. These Defendants have been presented with ample opportunity to correct their error and have refused to do so. The Plaintiff and her Co- Plaintiffs children have never been reunited. The injury is still occurring.

CLAIM FOR RELIEF 15:

NEGLIGENCE

AS AGAINST: THE UNITED STATES DEPARTMENT OF DEFENSE, THE UNITED STATES ARMY, FORT BLISS, TX, WILLIAM BEAUMONT ARMY MEDICAL CENTER, BETO O’ROURKE, BENITO TORRES, VERONICA ESCOBAR, VERONICA LERMA, OUISA DAVIS, TROY BROWN aka SCOTT REID, THERESA CABALLERO, BRIAN KELLEY, YAHARA GUTIERREZ, BRIAN KING, JESUS RODRIGUEZ, JESUS URENDA, TEXAS RIO GRANDE LEGAL AID, STEPHANIE JAMES, ALISON

NEAL, NEW YORK LEGAL ASSISTANCE GROUP, OLIVIA WILSON, ARYN WILLIAMS VANN, THE MANHATTAN FAMILY JUSTICE CENTER, EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT, JOHN DOE 1-100 and JANE DOE 1-1000

- 592. Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint into this count.
- 593. The above named Defendants in this County are liable for negligence.
- 594. The Defendants owed the Plaintiffs duty of care.
- 595. The Defendants breached their Duty of Care
- 596. The negligent actions of the named Defendants caused the Plaintiffs injuries.
- 597. The Defendants were able to foresee that their negligence would cause the Plaintiffs harm, then intentionally followed through with their actions to harm the Plaintiffs.

CLAIM FOR RELIEF 16:

NEGLIGENT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

AS AGAINST: LAURA TAYLOR SWAIN, KURT ANGLE, DAVID WOLKINSON, DORIS HUETT WILLIAMS, LARRY LAWRENCE, NORRIS LAWRENCE, DIEDRA COBB, VIRGINIA TRAVIS, JOHN HUETT, THE EL PASO COUNTY SHERIFF, ALYSSA NAVA, OUISA DAVIS, STEPHANIE JAMES, THE US MARSHAL SERVICE, DAVID WOLKINSON, HEATH WALLACE MILLER, SCOTT REID aka TROY BROWN, KIA STEVENS, XAVIER FULTON, GLEN FULTON, ALMA FULTON, THE CHICAGO POLICE DEPARTMENT, THE COOK COUNTY SHERIFF and EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT ...

- 598. Plaintiffs hereby re-allege and reincorporate each paragraph contained in this complaint to be interpreted as fully re-written herein.
- 599. Each paragraph of this complaint, each Defendant named in the entirety of this Complaint, and the actions of each Defendant named are to be reincorporated as if rewritten entirely herein.
- 600. Each above named Defendant and each of the Defendants named in the entirety this complaint acted intentionally and recklessly toward the Plaintiffs to cause them emotional harm.
- 601. The Defendants acts were extreme and outrageous.
- 602. The actions of the Defendants would shock the conscience of any reasonable person.
- 603. The Plaintiffs did not give consent for the Defendants to act with such outrageous conduct.
- 604. The Defendants expected their behavior to adversely affect the Plaintiffs mental and emotional health.
- 605. The Defendants behavior described in each paragraph of the entirety of this complaint was the conduct that caused the Plaintiffs distress.
- 606. XAVIER FULTON, stalked, and raped BIGGERS while she was pregnant. Next, October 21st 2011, FULTON cut BIGGERS open and kidnapped her children from her womb. February of 2011 FULTON attempted to murder BIGGERS by poisoning her. FULTON stalked BIGGERS with the intent to kidnap M.F. and murder BIGGERS from 2011-2023. FULTON was acting as the hands and feet of JOHN HUETT and KURT ANGLE.
- 607. JOHN HUETT and KURT ANGLE sent EPHRAM SIMS to beat BIGGERS to death and assist them in kidnapping her other children. FULTON and SIMS kidnapped M.F. and Z.S. on or about October 9th 2019 from New York City.

608. FULTON kidnapped BIGGERS children from her womb again May 17th 2016 with the assistance of KIA STEVENS and ARMY doctor QRUANA VEDDY”.
609. LARRY LAWRENCE and NORRIS LAWRENCE kidnapped BIGGERS from birth and began allowing their co-conspirators to rape her as a child. LARRY and NORRIS kidnapped BIGGERS children and stole her eggs. LARRY and NORRIS poisoned BIGGERS and caused tumors to grow in her abdomen.
610. LARRY, JOHN HUETT and KURT ANGLE stalked BIGGERS to her college dorm room in Twin Falls Idaho, drugged her, and raped her while she was unconscious.
611. NORRIS LAWRENCE raped BIGGERS and forced BIGGERS to preform sex acts on her when she was younger than 5 years old. JOHN HUETT, DORIS HUETT WILLIAMS, MICHELLE LYNCH, LARRY and NORRIS stalked BIGGERS to FLORIDA STATE UNIVERSITY and sabotaged her grades and athletic career. LARRY and NORRIS intentionally lied on BIGGERS and claimed that she was a drug addict, that she was a biological male, mentally ill, and a prostitute.
612. LARRY and NORRIS intentionally lied on BIGGERS and told her college coaches and teammates that she strangled her children to death when in fact LARRY, NORRIS, HEATH MILLER, JOHN HUETT, and DORIS HUETT WILLIAMS together had kidnapped them.
613. LARRY LAWRENCE and NORRIS LAWRENCE sent hitmen to kill BIGGERS and kidnap her children.
614. From January 2023- February 2023 LARRY and NORRIS sent the NYPD to BIGGERS home falsely claiming to be “concerned” about her nearly 10 times. February of 2023 LARRY and NORRIS showed up to BIGGERS home in New York City twice stalking her with the intent to murder her.
615. JOHN HUETT intentionally inflicted emotional distress upon BIGGERS when he continuously drugged and raped her from childhood into adult hood. HUETT impregnated BIGGERS when she was a child and has made multiple attempts to murder her. HUETT sabotaged BIGGERS college volleyball and college basketball career to conceal his rape of her. HUETT kidnapped BIGGERS children by ripping them from her womb. HUETT intentionally inflicted emotional distress upon BIGGERS by filming BIGGERS being raped and sex trafficked, then circulating the footage of the sex crimes for profit and for blackmail. HUETT intentionally inflicted emotional distress upon BIGGERS when he knowingly and intentionally lied and proclaimed that BIGGERS was a natural born male, a drug addict, mentally ill, and a prostitute that she had murdered her children.
616. ALYSSA NAVA and JAIME ESPARZA intentionally inflicted emotional distress upon BIGGERS when they intentionally fabricated a felony indictment against BIGGERS for “Aggravated Kidnapping” and “Custodial Interference”. NAVA had BIGGERS and her children kidnapped from a New York domestic violence shelter on behalf of SIMS and GALLOWAY aka FULTON. NAVA attempted to sentence BIGGERS to life in prison without BIGGERS ever being formally charged with any crime.
617. SAMUEL ‘SAM’ MEDRANO intentionally inflicted emotional distress upon the Plaintiff when he showed a willful and deliberate indifference to the fact that BIGGERS was never indicted and that no warrant was issued for BIGGERS arrest to initiate any proceedings in his Court. MEDRANO also issued custody order for BIGGERS children out of the fraudulent felony case against BIGGERS that stripped BIGGERS of her parental rights. In doing this MEDRANO knowingly and intentionally assisted in the kidnapping and unlawful concealment of BIGGERS children. MEDRANO was fully aware that he did not have jurisdiction or any authority whatsoever to issue child custody Orders. MEDRANO’S malicious and fraudulent order directly violated the terms of the order issued by the family Court.
618. MEDRANO took things even further when he issued a second fictitious arrest warrant for BIGGERS asserting that she had violated the terms of her bond conditions although BIGGERS didn’t have any bond conditions in place. From TEXAS, MEDRANO ordered the NYPD and the UNITED STATES MARSHAL SERVICE to kidnap BIGGERS by false arrest from her New York Apartment and to extradite her to El Paso.
619. BIGGERS former roommate and basketball teammate Judge ANGIE BARILL picked where MEDRANO left off and ordered the kidnapping of BIGGERS by false arrest on December 12th 2022.

BARILL is currently intentionally inflicting emotional distress upon BIGGERS by endeavoring to kidnap BIGGERS from New York City and falsely imprison her again. After issuing the 3rd fraudulent warrant for BIGGERS arrest, Judge BARILL showed up at the Constance Baker Motley Gym in Manhattan where BIGGERS works out. BARILL sat directly next to BIGGERS in the gym to intimidate her and make it known that she intends to kidnap and falsely imprison BIGGERS.

620. HEATH WALLACE MILLER stalked BIGGERS across the United States, sabotaged her employment opportunities, orchestrated the unlawful dispossession of her homes, intercepted her paychecks and lawsuit awards, vandalized her homes, sent men to beat her unconscious, sent men to rape her, and kidnapped her children by ripping them from her womb.
621. EPHRAM SIMS orchestrated BIGGERS being drugged and gang raped in her home. EPHRAM beat BIGGERS nearly to death then knowingly and intentionally lied and claimed that he was the victim. EPHRAM filed nearly 100 false police reports against BIGGERS, stalked her while he was on probation for family violence, and conspired to have BIGGERS falsely arrested and falsely imprisoned. SIMS stalked BIGGERS from El Paso Texas to New York and then kidnapped her children. SIMS celebrated his act of kidnapping on Facebook and Instagram with XAVIER FULTON , ASHLEY FULTON, and MIKAELA ANDREA TRAMMELL.

CLAIM FOR RELIEF 17:

RETALIATION

AS AGAINST: LAURA TAYLOR SWAIN and EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT

622. Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint. Each paragraph of this complaint and each Defendant named in this complaint are to be reincorporated as if they were rewritten entirely herein.
623. The Plaintiffs engaged in statutorily protected activity when reporting physical abuse, sexual harassment, and sexual abuse at IMPACT WRESTLING and at the WWE.
624. JEFF JARRETT, DIXIE CARTER, and KURT ANGLE took adverse action against the Plaintiff by withholding her pay, blackballing her from professional wrestling, breaching her contract, terminating employment, knowingly and intentionally issuing defamatory press releases, spreading knowingly false rumors and accusations about the Plaintiff.
625. Furthermore, IMPACT WRESTLING, KURT ANGLE, JOHN HUETT, GLEN FULTON, NORRIS LAWRENCE, LARRY LAWRENCE, DORIS HUETT WILLIAMS, JOHN DOE 1-100 and JANE DOE 1-100 gathered each Defendant named in this complaint to stalk, mutilate, physically assault, rape, murder, molest, sex-traffic, terrorize, and humiliate the Plaintiffs in retaliation for making reports to personnel and law enforcement.
626. After reporting workplace harassment and abuse, and after testifying in Court against the Defendants, the Plaintiffs were retaliated against by attempted vehicular homicide and multiple poisonings.
627. After reporting workplace harassment, abuse, and after testifying against the Defendants in Court, the Plaintiffs were repeatedly punched in the face by company employees and affiliates on behalf of KURT ANGLE.
628. After reporting workplace harassment, workplace abuse, and after testifying in Court against the Defendants, the Defendants, mainly KURT ANGLE, put GPS tracking devices on the Plaintiffs car and stalked her across the United States .

629. After reporting workplace harassment, workplace abuse, and after testifying against the Defendants, the Defendants employed law enforcement and officers of the Court to falsely imprison, falsely arrest, maliciously prosecute, and attempt to kill the Plaintiffs.
630. KURT ANGLE, DIXIE CARTER, DORIS HUETT WILLIAMS, PAULA WHITE, ALL ELITE WRESTLING, JOHN HUETT, LARRY LAWRENCE, NORRIS LAWRENCE, GLEN JACOBS , and GLEN FULTON acted as spear heads in the retaliatory attack against the Plaintiffs.
631. The Plaintiffs were as well targeted and attacked by the multiheaded criminal enterprise by being unjustifiably fired from every job and wrongfully evicted from every home from 2002-2020.
632. At the time this Complaint being filed, the criminal enterprise is continuing their retaliation by attempting to unlawfully evict the Plaintiffs from their current home.
633. These actions were taken against the Plaintiffs for participating in the protected activity of reporting crimes committed against them.

CLAIM FOR RELIEF 18:
FEDERAL STALKING
(18 U.S.C. § 2261)

634. Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint. Each Defendant named in the entirety of this complaint and their described actions are to be reincorporated as if they were rewritten entirely herein.
635. Each named Defendant in the entirety of this Complaint gang stalked the Plaintiffs as well as aided and abetted the acts of stalking the Plaintiffs across state lines and on different continents.
636. Each named Defendant in the entirety of this complaint followed the Plaintiffs across multiple state lines and into multiple countries with the intent to kill, injure, harass, intimidate, and place them in fear.
637. Each Defendant named in this complaint worked as one body to gang stalk the Plaintiffs.
638. In addition to stalking, these Defendants murdered the Plaintiffs emotional support animals. Three dogs were murdered: Prince, Princess, and Genesis.
639. KURT ANGLE, JOHN HUETT, DORIS HUETT WILLIAMS, LARRY LAWRENCE, NORRIS LAWRENCE, HEATH WALLACE MILLER, or HEATH MILLER, , EPHRAIM SIMS, and XAVIER FULTON placed GPS tracking devices on the Plaintiffs vehicle, downloaded spyware on her computers, followed her to her places of employment, and had her fired from each job in multiple states.
640. Likewise ANGLE, SIMS , FULTON , HUETT, WILLIAMS, LARRY LAWRENCE and NORRIS LAWRENCE followed the Plaintiffs to each place of residence and had them unlawfully dispossessed from their homes in multiple States.
641. As of today, 06/18/2023, ANGLE has continued to stalk BIGGERS in New York City as they have moved into the apartment next door to her.
642. From 2016-2019 M.F. was followed to her elementary school and had her school bus followed by KURT ANGLE, XAVIER FULTON , HEATH MILLER, and EPHRAIM SIMS.
643. Law enforcement, including DETECTIVE DIAZ of the El Paso Police Department, and DETECTIVE SANTIBANEZ of the EL Paso County Sheriff allowed, Detective CHARLES VERA of the EL PASO POLICE DEPARTMENT, ALYSSA NAVA, and JAIME ESPARZA participated in, and encouraged the stalking after receiving reports of the offense.
644. THE SHIRLEY NEW YORK POLICE DEPARTMENT and DETECTIVE GREG MILLER stalked the Plaintiffs, entered Brighter Tomorrows domestic violence shelter and kidnapped the Plaintiffs from the shelter.

645. From October 2019 until present day; the FBI, The Chicago Police Department, The Cook County Sheriff, La Casa, Brighter Tomorrows, the Suffolk County District Attorneys Office, the El Paso County District Attorneys office and the Manhattan District Attorneys Office all assisted the criminal enterprise in stalking and ultimately kidnapping the plaintiffs.
646. RICHARD BRUCE THARPE and THEOLA HAGGER offered the Plaintiffs legal representation so that they could stalk them up close and assist the criminal enterprise in kidnapping the Plaintiffs. THARPE and HAGGER had no intention of providing legal representation. Their only intent was to gather information for the criminal enterprise, and to stalk and intimidate the Plaintiffs.
647. In addition to the above named, each named Defendant in the entirety of this complaint followed the Defendants across State lines and into multiple countries to kill, injure, harass, sabotage, falsely arrest, falsely imprison, and place the Plaintiffs in fear.
648. Each Defendant named in this complaint unlawfully placed the Plaintiffs under surveillance by using the mail, interactive computer science, electronic communications, wire tapping, placing hidden cameras in Plaintiffs private home/vehicle, bank accounts, private investigators, and giving toys to the plaintiffs with hidden cameras.
649. ASHLEY FULTON confessed to stalking, recording, and wire tapping the Plaintiffs in the frivolous protective order she filed in Cook County.
650. NORRIS LAWRENCE and LARRY LAWRENCE continued gang stalking BIGGERS by employing multiple Defendants named in this Complaint to act as their hands, eyes, and feet. NORRIS and LARRY sent the NYPD to BIGGERS home 10 times between January and February of 2023 when she refused to take their calls. On February 2nd 2023 and again on February 3rd 2023 NORRIS LAWRENCE and LARRY LAWRENCE stalked BIGGERS across state lines and showed up at her Midtown Manhattan apartment.
651. KIA STEVENS began stalking BIGGERS when they both worked at IMPACT WRESTLING in 2008. From 2015-2016, KIA STEVENS altered her appearance and posed as "DR.VDOY" and became BIGGERS OBGYN.
652. On May 17th, 2016 while BIGGERS was giving birth, KIA STEVEN and DR. QURANA VEDDOY mutilated BIGGERS body, kidnapped her children from her womb, and filmed her savage acts on her cell phone.
653. While KIA aka Dr. VDOY completed her acts of savagery on BIGGERS during childbirth, JOHN WILLIAM ROBINSON aka CAPTAIN BRIAN KELL was standing by her side dressed in a disguise. On that day JOHN WILLIAM ROBINSON kidnapped children from BIGGERS womb.
654. ROBINSON stalked BIGGERS from Tallahassee, Florida to McDonough, GA in 2005, broke into BIGGERS apartment, and kidnapped her dog. ROBINSON drastically changed his appearance and reappeared in BIGGERS life multiple times posing as the mascot for the El Paso Chihuahuas in 2019, her military attorney CAPTAIN BRIAN KELLY at Fort Bliss, and as a legal assistant for N.Y.L.A.G's pro se clinic in 2022.
655. April 1st 2020 DAVID WOLKINSON, HEATH WALLACE MILLER, PAULA WHITE-CAIN, XAVIER FULTON, EPHRAIM SIMS KURT ANGLE, and SHELDON JACKLER placed hidden cameras in the Plaintiffs Manhattan apartment.
656. As of the filing of this lawsuit, BIGGERS is still being unlawfully filmed and recorded by the criminal enterprise in the privacy of her home.
657. The Plaintiffs private acts and private conversations in the privacy of their home were reenacted by the criminal enterprise on social media and network television shows.
658. HEATH WALLACE MILLER stalked BIGGERS in the same manner as his co-conspirators. In 2022, HEATH altered his appearance and appeared as a plumber to gain entry to BIGGERS Manhattan apartment in that same year. In 2022, HEATH altered his appearance and responded to BIGGERS call for a locksmith in Manhattan.

659. From 2019-2020, HEATH disguised himself as a cab driver and wrestler named "Blackfish" and stalked BIGGERS while she was training at Relentless Fitness.
660. In 2017 HEATH re- appeared in El Paso at the Plaintiffs residence posing as an employee for the water department named " MOSES UGES". HEATH impersonated elementary school faculty and nursery school workers to stalk M.F. and Z.S.. In October of 2011, HEATH stalked BIGGERS in Champaign, Illinois and kidnapped her children by cutting her open while she was unconscious .In 2010 HEATH appeared as an automobile mechanic , worked on BIGGERS Jeep, and placed a GPS tracker on it.
661. In 2018 HEATH moved into the apartment beneath BIGGERS.In July of 2015 HEATH moved into the house across the street from BIGGERS. In 2021, HEATH moved in next door to BIGGERS in Manhattan. Every city that the Plaintiffs have moved to, HEATH has altered his appearance, followed them, and caused them irreparable harm.

CLAIM FOR RELIEF 19:
FAILURE TO INTERVENE
(42 U.S.C § 1983)

AS AGAINST: THE NYPD, THE US MARSHAL SERVICE, THE FEDERAL BUREAU OF INVESTIGATIONS, THE EL PASO COUNTY SHERIFF, THE EL PASO POLICE DEPARTMENT, THE NEW YORK POLICE DEPARTMENT, THE NEW YORK COUNTY SHERIFF, THE CENTER FOR MISSING AND EXPLOITED CHILDREN, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE SUFFOLK COUNTY SHERIFF, THE JACKSONVILLE POLICE DEPARTMENT, THE MORGAN COUNTY SHERIFF, THE ORANGE COUNTY SHERIFF, THE ORLANDO POLICE DEPARTMENT, THE PITTSBURG POLICE DEPARTMENT, DENISE DEMARCO, ANGELA ZANE, DETECTIVE ANTHONY CORONA, DETECTIVE DIAZ, DETECTIVE CHARLES VERA, POLICE OFFICER DOE 1-100, THE URBANA POLICE DEPARTMENT, THE CHAMPAIGN POLICE DEPARTMENT, THE CHAMPAIGN COUNTY SHERIFF, THE COOK COUNTY SHERRIF , THE CHICAGO POLICE DEPARTMENT,MCDONOUGH GEORGIA POLICE DEPARTMENT,HENRY COUNTY DISTRICT ATTORNEYS OFFICE

662. Plaintiffs hereby re-allege and re-incorporate fully the contents of each paragraph contained in this Complaint in their entirety as if fully rewritten herein.
663. Each of the above named Defendants and every law enforcement agency/agent contained in the entirety of this complaint were aware that the Plaintiffs rights were being violated, had the opportunity to intervene, and intentionally failed to intervene.
664. Each law enforcement agent named in the entirety of this Complaint and their respective agencies devised a scheme to collectively intentionally fail to intervene in the kidnappings, violent crimes, and sex crimes committed against the Plaintiffs.
665. FBI Agent Doe 1-100 were aware that the Plaintiffs rights were being violated, that crimes including kidnapping had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
666. The NATIONAL CENTER FOR MISSING AND EXPLOITED CHILDREN were aware that M.F., and Z.S. had been kidnapped, that their rights were being violated, had the opportunity to intervene, and intentionally chose not to intervene.
667. DETECTIVE ANTHONY CORONA was aware that aware that the Plaintiffs rights were being violated, that crimes including kidnapping had occurred, had the opportunity to intervene, and intentionally chose not to intervene.

668. DETECTIVE CHARLES VERA was aware that aware that the Plaintiffs rights were being violated, that crimes including kidnapping had occurred, that stalking was occurring, had the opportunity to intervene, and intentionally chose not to intervene.
669. DETECTIVE MUNGER was aware that the Plaintiffs rights were being violated, that crimes including fraud and theft of BIGGERS paychecks had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
670. DETECTIVE DENISE DEMARCO was aware that the Plaintiffs rights were being violated, that crimes including assault and battery by ANGLE had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
671. Attorney GREGORY ANDERSON was aware that the Plaintiffs rights were being violated, that crimes including kidnapping , rape and stalking had occurred;, had the opportunity to intervene, and intentionally chose not to intervene.
672. DETECTIVE ANTHONY CORONA was aware that the Plaintiffs rights were being violated, that crimes including kidnapping had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
673. BEXAR COUNTY PROBATION OFFICER1 and BEXAR COUNTY PROBATION OFFICER 2 aware that the Plaintiffs crime victims rights were being violated, that probation violations were occurring ,that crimes including kidnapping and stalking had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
674. SHERIFF DEPUTY DOE 1-100 were aware that the Plaintiffs rights were being violated, that crimes including kidnapping, stalking and rape had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
675. NEW YORK ACS was aware that the Plaintiffs rights were being violated, that crimes including kidnapping had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
676. THE ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES aware that the Plaintiffs rights were being violated, that crimes including kidnapping had occurred, had the opportunity to intervene, and intentionally chose not to intervene.
677. TEXAS CHILD PROTECTIVE SERVICES aware that the Plaintiffs rights were being violated, that crimes including kidnapping had occurred, had the opportunity to intervene, and intentionally chose not to intervene.

CLAIM FOR RELIEF 20:
MUNICIPAL LIABILITY FOR FAILURE TO INTERVENE
(42 U.S.C. § 1983)

678. Plaintiffs hereby reincorporate and reallege each paragraph of this Complaint as if fully rewritten herein.
679. The Plaintiffs reported the October 8th 2019 and October 10th 2019 kidnappings to each law enforcement agency named in this Complaint.
680. Each law enforcement agency showed a deliberate and intentionally indifference to the fact that the Plaintiffs were being subjected to criminal acts.
681. The CITY OF NEW YORK is responsible for the failure of the NYPD failure to intervene when presented with evidence of the October 2019 kidnapping from New York City.
682. The CITY OF EL PASO and the city of HORIZON CITY Texas are responsible for the failure of the EL Paso County Sheriff and the El Paso Police Departments failure to intervene when presented with evidence of kidnapping, stalking, rape, domestic violence, mortgage fraud, and domestic violence.

683. The HAMLET OF NEW YORK and the CITY OF BROOKHAVEN are responsible for the failure to intervene when presented with evidence of kidnapping that occurred at the SHIRLEY NEW YORK 7th precinct Police Department on October 8th 2019.
684. THE CITY OF PITTSBURGH is responsible for the failure to intervene by Detective DENISE DEMARCO after receiving a report from BIGGERS that KURT ANGLE mauled her, bit her in her face and disfigured her.
685. MOON TOWNSHIP, PA is responsible for failure to intervene when DETECTIVE MUNGER willfully and intentionally chose to turn a blind eye to the mail fraud and theft of BIGGERS paychecks by ANGLE.
686. The CITY OF SAN ANTONIO is liable for its probation officers failure to intervene in probation violations by SIMS that included stalking and kidnapping the Plaintiffs October 8th of 2019. Not only did the probation officers fail to intervene, the rewarded SIMS for committing his crimes by granting him early release from probation.

CLAIM FOR RELIEF 21:

MUNICIPAL LIABILITY FOR UNCONSTITUTIONAL CUSTOM, PRACTICE OR POLICY

(42 U.S.C. § 1983)

687. The Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint as if fully rewritten herein.
688. MCDONOUGH, GA subjected the Plaintiffs to their unconstitutional custom of making unlawful traffic stops and false arrests with the intent to terrorize the Plaintiffs.
689. ATLANTA ,GA subjected the Plaintiffs to their unconstitutional practice of making unlawful traffic stops and issuing traffic tickets without probable cause.
690. CHICAGO, ILLINOIS subjected the Plaintiffs to their unconstitutional practice of not enforcing protective order violations, law enforcement assisting in the violation of court orders, kidnapping, stalking, and rewarding criminals for committing crimes.
691. BROOKHAVEN, NEW YORK and the hamlet of SHIRLEY, NEW YORK subjected the Plaintiffs to their unconstitutional custom of their officers violating domestic violence protective orders, refusing to enforce criminal no contact orders, refusing to enforce court orders, assisting violent criminals in interstate stalking and kidnapping, and making false arrest without an arrest warrant and without probable cause.
692. The city of LOS ANGELES , CALIFORNIA and LOS ANGELES COUNTY subjected the Plaintiffs to the unconstitutional custom of handcuffing and unlawfully detaining citizens without probable cause.
693. NEW YORK CITY, NEW YORK subjected the Plaintiffs to their unconstitutional custom of their officers violating domestic violence protective orders, refusing to enforce criminal no contact orders, refusing to enforce court orders, assisting violent criminals in interstate stalking and kidnapping, and making false arrest without an arrest warrant and without probable cause.
694. TAMPA, FLORIDA subjected the Plaintiffs to their unconstitutional practice of allowing domestic violence protective orders to be violated, issuing fictional arrest warrants, making multiple back to back traffic stops, and issuing traffic tickets with the sole purpose of terrorizing the Plaintiffs.
695. EL PASO, TEXAS and SAN ANTONIO , TEXAS subjected the Plaintiffs to their unconstitutional custom of their officers violating domestic violence protective orders, refusing to enforce criminal no contact orders, assisting violent criminals in interstate stalking and kidnapping, and making false arrest without an arrest warrant and without probable cause.

CLAIM FOR RELIEF 22:

STATE CREATED DANGER BY DUE PROCESS VIOLATION

(42 U.S.C § 1983)

696. Plaintiffs re-allege and re-incorporate the above paragraphs of this complaint. Each paragraph of this complaint is to be interpreted as if fully re-written herein.
697. Pursuant to the Fourteenth Amendment, a person has the constitutional right to be free from a government employee affirmatively placing that person in a position of actual, particularized danger, or in any situation of actual particularized danger than the position the person already faced.
698. JAIME ESPARZA, YVONNE ROSALES,BILL HICKS, ALYSSA NAVA,ASHLEY MARTINEZ, YAHARA GUITIERREZ, MARK SPINN, SAMUEL 'SAM' MEDRANO, ANGIE BARILL, JESUS URENDA,JESUS RODRIGUEZ, THE EL PASO COUNTY SHERIFF, THE SHIRLEY NEW YORK POLICE DEPARTMNET, THE EL PASO POLICE DEPARTMENT,THE NEW YORK POLICE DEPARTMENT, THE STATE OF TEXAS, THE STATE OF ILLINOIS, and THE STATE OF NEW YORK affirmatively placed BIGGERS, M.F., and Z.S. in a position of actual and particularized danger.
699. The named defendants acted with deliberate indifference to a known and obvious danger;
700. The actions of the defendants created an actual, particularized danger that caused foreseeable injuries to the Plaintiffs.
701. By creating a fictitious indictment and fictitious arrest warrant, THE STATE OF TEXAS via THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE created danger that is more dangerous that what the Plaintiffs already faced.
702. The STATE OF NEW YORK continued and supported the danger created by the STATE OF TEXAS when they falsely arrested and falsely imprisoned BIGGERS twice without a valid warrant, or any probable cause for the arrest.
703. The Defendants named in this suit created and enhanced the danger that BIGGERS , M.F. , And Z.S. were in by denying them their right to the Due Process of Law.
704. Not only did these agencies create danger, they also to direct actions to put the Plaintiffs in danger such as stalking and kidnapping them from domestic violence shelters.
705. When viewed as a whole, the actions of the State Actor defendants named in this complaint would shock the conscience of any reasonable person.
706. The actions and lack of actions by the Defendants are distinct from the danger of the general public.

CLAIM FOR RELIEF 23:

VIOLATION OF THE EQUAL PROTECTION CALUSE

(42 U.S.C § 1983, and 42 U.S.C § 1981)

AS AGAINST: THE EL PASO COUNTY DISTRICT ATTORNEYS' OFFICE,ALYSSA NAVA, MARK SPINN, JAIME ESPARZA, YVONNE ROSALES, BILL HICKS, ASHLEY MARTINEZ, THE EL PASO COUNTY SHERIFF, THE EL PASO POLICE DEPARTMENT, THE EL PASO CONSTABLES OFFICE, JESUS URENDA, YAHARA GUTIERREZ, RICHARD WILES, THE SUFFOLK COUNTY DISTRICT ATTORNEYS OFFICE, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE NEW YORK POLICE DEPARTMENT, THE NEW YORK COUNTY SHERIFF, THE COOK COUNTY SHERIFF, THE CHICAGO POLICE DEPARTMENT,LORI LIGHTFOOT, THE FBI, THE UNITED STATES MARSHALL SERVICE, C.D. SOUTH,LIONEL JEAN BAPTISTE, THE UNITED STATES MARSHAL SERVICE, THE NEW YORK/NEW JERSEY FUGITIVE TASK FORCE, MICHAEL BARNES, THE UNITED STATES ARMY MILITARY POLICE, THE BEXAR COUNTY DISTRICT ATTOENEYS OFFICE, MICHAEL DELEON, THE BEXAR COUNTY PROBATION OFFICE, THE EL PASO PROBATION OFFICE, THE ORLANDO

POLICE DEPARTMENT, THE ORANGE COUNTY SHERIFF, EACH STATE ACTOR DEFENDANT NAMED IN THIS COMPLAINT, JOHN DOE 1-100 and JANE DOE 1-100

707. The Plaintiffs hereby re-allege and re-incorporate each paragraph of this complaint.
708. Each paragraph of this complaint and each named Defendant in the entirety of this complaint are to be fully reincorporated as if fully rewritten herein.
709. The Equal Protection Clause affords that no State shall make or abridge any law that shall abridge the privileges or immunities of citizens of the United States of America; nor shall any State deprive any person of life, liberty, or property without due process of law, nor deny any person within its jurisdiction of the equal protection of laws.
710. Each of the named Defendants in this complaint intentionally and knowingly deprived the Plaintiffs of their right to equal protection under the law. **See Motion to Dismiss.**
711. The discrimination these named Defendants subjected the Plaintiffs to are based upon the Plaintiffs race and gender,
712. The Plaintiffs were protected by domestic violence Orders of protection as well as custody Orders yet no law enforcement agency would recognize or enforce the Orders.
713. THE EL PASO COUNTY DISTRICT ATTORNEYS' OFFICE, ALYSSA NAVA, MARK SPINN, JAIME ESPARZA, YVONNE ROSALES, BILL HICKS, MAYOR DEE MARGO, RICHARD WILES, and ASHLEY MARTINEZ instructed all El Paso law enforcement agencies to not recognize the Plaintiffs Orders of Protection and child custody orders. These Defendants encouraged and allowed crimes of kidnapping and stalking to be committed against the Plaintiffs. Next, these Defendants created fictional indictments and arrest warrants to maliciously prosecute BIGGERS for kidnapping as they themselves were kidnapping BIGGERS and her children.
714. THE EL PASO COUNTY DISTRICT ATTORNEYS OFFICE allowed SIMS to kidnap the Plaintiffs children and then maliciously prosecuted BIGGERS for a kidnapping that never occurred.
715. THE EL PASO COUNTY DISTRICT ATTORNEYS OFFICE refused to prosecute SIMS for any crimes he committed against the Plaintiffs **(See Motion to Dismiss Exhibit)**
716. THE EL PASO COUNTY SHERIFF, THE EL PASO POLICE DEPARTMENT, THE EL PASO CONSTABLES OFFICE, and the EL PASO FBI completed the conspiracy to deny the Plaintiffs equal protection under the law when they blatantly refused to enforce violations of court orders.
717. December 12th 2017 THE EL PASO COUNTY CONSTABLES OFFICE falsely arrested and kidnapped BIGGERS while they assisted SIMS in burglarizing her private residence. BIGGERS made multiple reports to the EL PASO POLICE DEPARTMENT concerning the burglary and even dialed 911 as the burglary was occurring. The EL PASO POLICE DEPARTMENT denied the Plaintiffs their right to equal protection when they acted as if they were taking BIGGERS police reports, then deleted the police reports from the system. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE refused to prosecute SIMS and JACOB CHESTER WILLIAMS for the burglary. THE EL PASO DISTRICT ATTORNEYS OFFICE is in possession of the Plaintiffs electronic devices that were burglarized from her home that day.
718. On December 12th 2017 SIMS also called 911 and made a false police report that BIGGERS babysitter, CLAUDIA CORRAL, had kidnapped BIGGERS children. M.F., Z.S., and CORRAL were surrounded by a SWAT team at McDonalds while BIGGERS was at work. BIGGERS attempted to make a report for SIMS making the false police report. THE EL PASO POLICE DEPARTMENT refused to take the report and told BIGGERS that SIMS call to 911" was not a false police report".
719. Judge JESUS URENDA denied the Plaintiffs access to equal protection of the law when he issued an illegal writ of possession and unlawfully dispossessed the Plaintiffs of their home at 3081 Tierra Salada Drive. Just two weeks before URENDA issued the illegal writ, BIGGERS defeated DAN OLIVAS and ASSOCIATES in a retaliatory eviction proceeding. After issuing the Illegal writ, URENDA and the EL PASO CONSTABLES OFFICE falsely arrested and falsely imprisoned BIGGERS so that her home could be burglarized by SIMS, JACOB CHESTER WILLIAMS, LORRIANE FRIAS, and JOHN DOE 1-100.

720. YAHARA GUTIERREZ denied the Plaintiffs equal protection under the law when she ignored the fact that SIMS was banned by his criminal family violence conviction from contacting the Plaintiffs.
721. GUTIERREZ the defaulted a custody order for BIGGERS children to SIMS with full knowledge that his criminal case prohibited him from any contact with his victims whatsoever.
722. GUTIERREZ refused to allow BIGGERS to testify in her case, denied her right to a jury trial, and outrageously abused her discretion in her efforts to obliterate the equal protection clause concerning the Plaintiffs. **(See Exhibit)**
723. THE SUFFOLK COUNTY DISTRICT ATTORNEYS OFFICE, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE NEW YORK POLICE DEPARTMENT, THE NEW YORK COUNTY SHERIFF, THE COOK COUNTY SHERIFF, THE NEW YORK FUGIATIVE SQUAD, NEW YORK ACS, TEXAS CHILD PROTECTIVE SERVICES, THE ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES, THE CHICAGO POLICE DEPARTMENT, LORI LIGHTFOOT, THE FBI, THE UNITED STATES MARSHALL SERVICE, THE CHICAGO FBI, C.D. SOUTH, Judge LIONEL JEAN BAPTISTE, MARK LESKO, MARGOT GARANT, BILL DEBLASIO, and ERIC ADAMS denied the Plaintiffs equal protection under the law when they knowingly and intentionally violated the Plaintiffs Orders of Protection, custody orders, and assisted in the kidnapping of the Plaintiffs. These Defendants also refused to enforce valid custody and protective orders that were being violated.
724. LIGHTFOOT, BAPTISTE, LESKO, DEBLASSIO, ADAMS, and GARANT allowed and or instructed their respective law enforcement agencies to violate BIGGERS protective orders.
725. BAPTISTE not only violated BIGGERS order, he committed fraud and altered BIGGERS domestic violence protective orders with the assistance of ISMAEL PEASE.
726. THE BEXAR COUNTY DISTRICT ATTORNEYS OFFICE, Judge MICHAEL DELEON, THE BEXAR COUNTY PROBATION OFFICE, and THE EL PASO PROBATION OFFICE allowed their criminal Defendant and probationer EPHRAM SIMS to stalk and kidnap the Plaintiffs in direct violation of their own no contact Orders. They refused to protect the Plaintiffs and went as far to publish BIGGERS name in SIMS criminal docket even though she was the victim.
727. DELEON, the BEXAR COUNTY DISTRICT ATTORNEY, and THE BEXAR COUNTY PROBATION OFFICE refused to allow BIGGERS to attend the criminal proceedings, and then rewarded SIMS for stalking and kidnapping his victims by allowing him early release from probation.
728. THE ORLANDO POLICE DEPARTMENT and THE ORANGE COUNTY SHERIFF responded to calls for domestic violence committed by ANGLE against BIGGERS. As BIGGERS was being rolled away on a stretcher, the officers took photos with the offender and asked for his autograph.
729. The ALLEGHENY COUNTY PROSECUTORS OFFICE released BIGGERS name and circulated BIGGERS Florida State University volleyball photo to the media while she was the victim of ANGLE'S protective order violation and harassment case. They also "deleted" ANGLE's charges and denied BIGGERS a right to be informed of and attend hearings.
730. The above-named Defendants showed willful and deliberate indifference to the fact that the Plaintiffs Orders of Protection and custody orders were being actively violated.
731. The above named Defendants intentionally and willfully allowed the Plaintiffs to be kidnapped and participated in the kidnappings. These denials of equal protection of law were based upon the Plaintiffs race and gender.
732. These denials of equal protection to the Plaintiffs created an avalanche of state created danger and irreparable injuries to the Plaintiffs.

CLAIM FOR RELIEF 24:
DEFAMATION OF CHARACTER

AS AGAINST: EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT

733. The Plaintiffs hereby re-allege and reincorporate each paragraph and each Defendant named in this complaint.
734. Each paragraph of this complaint is to be reincorporated as if fully re-written herein.
735. The acts of Defamation of the Plaintiffs character were carried out by each named member of the criminal enterprise as if they were speaking with one voice.
736. The Defendants named in this Count publicly identified the Plaintiffs by name as they made reckless knowingly false claims, published and republished the knowingly false statements.
737. The Defendants made false statements of fact about the Plaintiffs and communicated the false statements to third parties that include the Associated Press.
738. The Defendants were negligent and acted with malice as they showed a willful and intentional indifference for the fact that they were making and spreading knowingly false information.
739. The Defendants named in the entirety of this complaint knowingly and intentionally lied on the Plaintiffs when they asserted that the Plaintiffs were illiterate, incompetent, mentally ill, kidnappers, prostitutes, liars, biological males, and that they had murdered children.
740. KURT ANGLE and HEATH MILLER defamed BIGGERS when they both knowingly and intentionally lied by proclaiming that BIGGERS lied about them physically assaulting her. KURT ANGLE and HEATH MILLER also intentionally lied on BIGGERS when they proclaimed that she was "on meth". KURT ANGLE went on the news after he had repeatedly beaten, stalked, drugged, and raped BIGGERS and falsely proclaimed that her reports of his abuse were lies in attempt for her to "get money". As KURT ANGLE made these knowingly false statements he was actively stealing BIGGERS paychecks from the mail and depositing them into his PNC account without BIGGERS knowledge or consent.
741. TIM DELINA and TIMOTHY MCGILL defamed BIGGERS when they claimed that she murdered her unborn children. When DILENA and MCGILL made this statement, they were fully aware that BIGGERS did not murder her unborn children, but that they had kidnapped them after DELINA posed as a nurse in the hospital and later ripped the children from BIGGERS womb. DILENA and MCGILL knew that BIGGERS had not murdered her children because DILENA kidnapped BIGGERS children and has continued to unlawfully conceal the location of her children until this very day.
742. JOHN HUETT defamed BIGGERS when he claimed that she murdered her unborn children in 2000, that she was a prostitute, a natural born male, and a drug addict. When HUETT made these statements he was fully aware that BIGGERS did not murder her unborn children, that she was not a prostitute, that she was a natural born female, and that she had never been addicted to any drugs.
743. HUETT was aware that he had kidnapped BIGGERS children by violently ripping them from BIGGERS womb. HUETT was fully aware that it was he and his co-conspirators who tried to murder BIGGERS and her children while she was pregnant by poisoning them to conceal his crime of raping BIGGERS while she was still a child. HUETT knew that BIGGERS had not murdered her children because HUETT kidnapped BIGGERS children and has continued to unlawfully conceal the location of her children until this very day. After ripping BIGGERS children from her womb that were a result of HUETT raping her, HUETT then venomously spread lies about BIGGERS that she was a biological male with full knowledge that BIGGERS was not a biological male. HUETT spread the lie that BIGGERS was a biological male to conceal the children she gave birth to that resulted from him raping BIGGERS while she was still a child. HUETT falsely claimed that BIGGERS was a prostitute to conceal the fact that he had raped her and filmed himself raping her while she was still a child.
744. DORIS HUETT WILLIAMS defamed BIGGERS when she claimed that BIGGERS murdered her unborn children. WILLIAMS also knowingly and intentionally lied and claimed that BIGGERS was a biological male. When WILLIAMS made this statement she was fully aware that BIGGERS did not murder her

unborn children, but that she and her co-conspirators had posed as a hospital staff and later kidnapped BIGGERS children by ripping the children from BIGGERS womb. WILLIAMS was fully aware that she and her co-conspirators were attempting to murder BIGGERS and her unborn children by poisoning her during her pregnancy. WILLIAMS knew that BIGGERS had not murdered her children because WILLIAMS participated in the kidnapping of BIGGERS children and has continued to unlawfully conceal the location of the kidnapped children until this very day.

745. LARRY LAWRENCE and NORRIS LAWRENCE defamed BIGGERS when they intentionally and knowingly falsely claimed that BIGGERS murdered her unborn children, that she was a prostitute, a natural born male, and addicted to drugs. LARRY and NORRIS also knowingly and intentionally lied when they claimed that BIGGERS was a biological male.
746. When LARRY and NORRIS made these false statements they were fully aware that BIGGERS did not murder her unborn children, but that they and her co-conspirators had assisted HEATH MILLER, XAVIER FULTON, DILENA, MCGILL, HUETT, and WILLIAMS in ripping the children from BIGGERS womb and kidnapping them. LARRY and NORRIS were fully aware that BIGGERS was not a prostitute, but that LARRY and NORRIS were raping BIGGERS since she was a child, filming themselves rape BIGGERS, and distributing their child pornography of BIGGERS just as HUETT did.
747. TYLER PERRY and JEREMY BELL defamed BIGGERS when he intentionally lied and broadcast that BIGGERS was a biological male and a drug addict. TYLER PERRY and JEREMY BELL were fully aware that they were lying when they made these representations and did so to cause BIGGERS irreparable harm.
748. RICHARD WILES, CRIME STOPPERS, THE EL PASO COUNTY SHERIFF, and THE EL PASO POLICE DEPARTMENT intentionally and knowingly falsely proclaimed that BIGGERS was a "Most Wanted" fugitive. WILES issued a press release to Crime Stoppers and the El Paso Times Newspaper that BIGGERS was "wanted" for felony custodial interference. When WILES made this defamatory claim, he was fully aware that no Judge had signed any warrant for BIGGERS and that she had never been charged with any crime.
749. SAMUEL 'SAM' MEDRANO intentionally and knowingly falsely proclaimed that BIGGERS was "Wanted" for failure to appear at a Court date, Aggravated Kidnapping, and Interference with Child Custody. When MEDRANO intentionally made this fabricated proclamation, he put it in writing in the form of a fictitious arrest warrant and provided it to law enforcement and to the media. At the time MEDRANO took these defamatory actions, he was fully aware that BIGGERS had never been charged with nor indicted for any crime, and that no court hearing existed for BIGGERS to miss. MEDRANO sent the NYPD and the US Marshal Service to kidnap BIGGERS from her Manhattan apartment based on his defamatory, knowingly fictitious, and fraudulent warrant.
750. ANGIE BARILL intentionally and knowingly falsely proclaimed that BIGGERS was "Wanted" for failure to appear at a Court date, Aggravated Kidnapping, and Interference with Child Custody. When BARILL intentionally made this fabricated proclamation, she put it in writing in the form of a fictitious arrest warrant and provided it to the media for circulation. When BARILL took these defamatory actions, she was fully aware that BIGGERS had never been charged with any crime and that no court hearing existed for BIGGERS to miss. BARILL sent the NYPD and the US Marshal Service to kidnap BIGGERS from her Manhattan apartment based on her defamatory, knowingly fictitious, and fraudulent warrant.
751. BIGGERS former co-worker ALYSSA NAVA and THE STATE OF TEXAS defamed BIGGERS when she intentionally and knowingly falsely proclaimed that BIGGERS had been indicted for "Aggravated Kidnapping" and Interference with Child Custody. At the time NAVA made this statement she was fully aware that she was lying, fully aware that no grand jury ever met, and fully aware that no grand jury indicted BIGGERS. NAVA issued a press release from the El Paso County District Attorneys office that there was an active warrant for BIGGERS arrest and that she had been indicted. When Nava made these statements she knew that they were false. Based on her fraudulent and fictitious

assertions, NAVA and JAIME ESPARZA sent the Shirley New York Police and the Fugitive Squad to kidnap BIGGERS and her children from a domestic violence shelter.

752. ASHLEY MARTINEZ defamed BIGGERS when she intentionally and knowingly falsely proclaimed that BIGGERS had been charged and indicted for “Aggravated Kidnapping” and Interference With Child Custody. When MARTINEZ made these false and defamatory statements against BIGGERS, she was fully aware that no grand jury indicted BIGGERS for any crime, that BIGGERS had never been charged with any crime, and that no warrant for BIGGERS arrest had ever been signed by any Judge.
753. Up until the filing of this complaint, MARTINEZ is still defaming BIGGERS and attempting to profit from her defamatory statement by pursuing a wrongful conviction against BIGGERS for a crime she is aware that BIGGERS was never charged with. Assistant District Attorney MARK SPINN defamed BIGGERS when he intentionally and knowingly falsely proclaimed that BIGGERS had been indicted for “Aggravated Kidnapping” and Interference with Child Custody. SPINN also intentionally and knowingly falsely proclaimed that BIGGERS was “wanted” for possession of marijuana. At the time SPINN made this statement he was fully aware that he was lying. SPINN was fully aware that BIGGERS was never arrested or charged with possession of marijuana. SPINN was also fully aware that no grand jury ever met, and fully aware that no grand jury indicted BIGGERS for Interference with Child Custody and Aggravated Kidnapping.
754. THE EL PASO TIMES Newspaper and Crimestoppers defamed BIGGERS when they knowingly and intentionally published the audacious lie that BIGGERS was “El Paso’s Most Wanted Fugitive” for the crimes of Aggravated Kidnapping and Interference with Child Custody. When the El Paso Times Newspaper and Crimestoppers published these false accusations, they were fully aware that there was no evidence that BIGGERS had ever been charged with any crime. The MICROSOFT network republished the lies in 2023.
755. JOHN DOE 1-100 and JANE DOE 1-100 defamed BIGGERS when they made knowingly false statements about BIGGERS, published the knowingly false statements, and even republished the knowingly false statements.

CLAIM FOR RELIEF 25:

TORTIOUS INTERFERENCE WITH BUSINESS CONTRACTS and TORTIOUS INTERFERENCE WITH ECONOMIC ADVANTAGE

AS AGAINST: EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT

756. The Plaintiffs hereby reincorporate and re-allege the factual allegations contained in each paragraph of this Complaint. The actions of each Defendant in the entirety of this Complaint are to be hereby reincorporated as if fully re-written herein.
757. The actions of the Defendants described in the entirety of this Complaint were done intentionally to sabotage and tortiously interfere with the Plaintiffs current and pending business contracts.
758. The named Defendants improperly induced the Breach of Contract and sabotaged future contracts between BIGGERS and WORLD WRESTLING ENTERTAINMENT, the E! channel, the Creative Artist Agency, Florida State University, The University of Pittsburgh, the University of Texas Austin, as well as Company Doe 1-1000
759. The named Defendants were aware of the Plaintiffs contracts at the time of interference, and their interference was improper.
760. The interference by the Defendants was done intentionally, and the Plaintiffs suffered damages as a result of these actions.

CLAIM FOR RELIEF 26:

FRAUD

(18 U.S.C§ 1341, 18 U.S.C§ 1001)

AS AGAINST:LAURA TAYLOR SWAIN, JIM MULLADY, MARY TREW, GLEN FULTON, LIONEL JEAN BAPTISTE, LEROY EKECHUWU, JESUS RODRIGUEZ, JESUS URENDA, RICHARD BRUCE THARPE, RICHARD RAMON, OUISA DAVIS, VERONICA T. LERMA, ALYSSA NAVA,ASHLEY MARTINEZ, PHILLIP KATZ,MICHELLE ROBERTS, CHRISTINA COROCAN, EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT...

761. The Plaintiffs hereby re-allege and reincorporate each paragraph of this Complaint as if fully re-written herein.
762. The above named Defendants and the Defendants named throughout the entirety of this Complaint committed the offense of Fraud against the plaintiffs as they:
763. Made false, fictitious, fraudulent statements or representations;
764. Manufactured and used false writings, instruments and documents knowing that the same contained false, fictitious, and fraudulent statement and entries;
765. Falsified, concealed, and covered up by trick, scheme and device material facts;
766. Devised and intended to devise schemes or artifice to defraud for the purposes of obtaining money and property by means of false pretenses.
767. Highlighted as follows are some of the most audacious acts of fraud committed by the Defendants to advance their criminal enterprise:
768. Attorney JAMES MULLADY committed fraud December 2011 when he forged BIGGERS signature on Court documents that she agreed to no income withholding, altered the results of BIGGERS DNA Paternity test for her child, kidnapped her children with fraudulent Court orders, falsified financial information, and proceeded in a child support hearing with full knowledge that the Court did not have Jurisdiction over the child.
769. GLEN FULTON hired and privately retained JIM MULLADY to commit the fraud upon the court, assisted in the alteration of DNA paternity test, and secured a child support Order with the intent to falsely imprison the parents of the child. GLEN FULTON also kidnapped BIGGERS children, Z.S.'s and M.F.'s siblings through acts of fraud.
770. November 2019 LIONEL JEAN BAPTISTE committed Fraud Upon the Court when he trespassed on the Cook County Court house at 9:00 pm, concealed a kidnapping, invited the kidnappers to his fake night court hearing, and issued Court Orders to kidnap M.F.. BAPTISTE took these actions of fraud in cahoots with GLEN FULTON and was fully aware that he did not have jurisdiction and that his actions were criminal in nature.
771. LEROY EKECHUWU falsified custody orders, protective orders, and participated in fraudulent Court proceedings that he initiated. LEROY , the COOK COUNTY SHERIFF, and the CHICAGO POLICE department feloniously falsified a protective order for XAVIER FULTON and ASHLEY FULTON in LEEDS.
772. MARY TREW committed fraud when she showed up to preside over a hearing which did not exist in her Cout. Like BAPTISTE who hand selected her to complete the kidnapping of M.F., TREW issued illegal orders against BIGGERS in Cook County Illinois for a case that was being litigated in Texas.
773. TREW argued that the case had been transferred from Champaign County, however the docket reflects that no transfer of the case from Champaign County to Cook County ever occurred.
774. A UCCJEA hearing was held to establish the Court of continuing exclusive jurisdiction concerning M.F. and the actions of BAPTISTE and TREW. It was determined that Texas had never given up jurisdiction over the child's case. Orders were issued by Judge TREW and Judge RODRIGUEZ of Texas supporting this fact.

775. Shockingly, Judge TREW refused to dismiss and vacate her fraudulent Orders that she issued for BIGGERS child when BIGGERS filed motions asking her to do so.
776. Not only did Trew commit the fraud, she admitted to committing the fraud on the court by her own court order and to this day had insubordinately refused to correct her fraudulent act.
777. RICHARD BRUCE THARPE committed fraud by knowingly and intentionally filing perjury laced motions and accepting BIGGERS family law case with the intent to kidnap her children and have her falsely imprisoned.
778. FELIX VALENZUELA committed fraud when he sought and obtained a writ of possession for BIGGERS home after his clients were defeated by BIGGERS in the eviction proceedings.
779. DAN OLIVAS AND ASSOCIATES, PATTI OLIVAS, THERESA, LORAIN FRIAS, and EL PASO COLLABORATIVE committed fraud when they sought and obtained a Writ of Possession for BIGGERS property after they were defeated by BIGGERS in the eviction proceeding.
780. JESUS RODRIGUEZ committed fraud when he knowingly and intentionally presided over BIGGERS family case in violation of the Judicial Code of Conduct. RODRIGUEZ was BIGGERS roommate in college and working with the criminal enterprise to kidnap BIGGERS children and falsely imprison her.
781. OUISA DAVIS, VERONICA LERMA, RICHARD ROMAN, RAFAEL MORALES, THEOLA HAGGER, TROY BROWN, COTT REED, and STEPHANIE JAMES committed fraud when they agreed to represent BIGGERS with the intent of kidnapping BIGGERS children, falsely imprisoning her, extorting her, and unlawfully dispossessing her of her home.
782. ALYSSA NAVA, ASHLEY MARTINEZ, JAIME ESPARZA, MARK SPINN, YVONNE ROSALES, and BILL HICKS committed and are currently committing Fraud in that they are aware that they and the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE created fictitious charging instruments in lieu of kidnapping BIGGERS children and falsely imprisoning her.
783. PHILIP KATZ is committing fraud upon the court when he refused to inform the New York Family Court of the preexisting conflict of interest between himself and BIGGERS. KATZ attempted to fraudulently and did sabotage BIGGERS securing orders of protection. KATZ is a spearhead in the legion of lawyers committing fraud on the Court for the advancement of **ANGL'S** criminal enterprise. It was necessary for BIGGERS to file this suit to inform the Courts of the conflict of interest between herself and KATZ.
784. MICHELLE F.P. ROBERTS accepted appointment to BIGGERS Order of Protection cases in New York Family Court to sabotage BIGGERS securing the Orders. BIGGERS had to complain to the Attorney Grievance Committee to get ROBERTS to inform the Court of the conflict.
785. CAPTAIN BRIAN KELLEY aka JOHN ROBINSON committed fraud when he fraudulently enlisted into the ARMY to stalk BIGGERS and kidnap her children. BIGGERS knew CAPTAIN KELLY in 2002 as her boyfriend JOHN ROBINSON. ROBINSON altered his appearance and re-appeared as her Military attorney "Captain KELLY" in 2017. This was done to sabotage BIGGERS efforts to seek justice for military crimes committed against her and her children. ROBINSON was not a lawyer and was not properly enlisted into the military.
786. November 2022 ROBINSON again re-appeared impersonating HENRY MULEHEIM and JARED COHEN of NEW YORK LEGAL ASSISTANCE GROUP.
787. BIGGERS had sought the help of NEW YORK LEGAL ASSISTANCE GROUP for help in filing this lawsuit. The meetings he had with BIGGERS were by telephone. ROBINSON changed his voice to conceal his acts of fraud. ROBINSON aka MULEHEIM aka COHEN committed fraud by blocking BIGGERS access to legal assistance after NYLAG accepted her case. HENRY MULEHEIM and JARED COHEN participated in and allowed these acts of fraud upon the Court.
788. YAHARA GUITIERREZ committed fraud when she colluded with STEPHANIE JAMES, JAIME ESPARZA, THE EL PASO COUNTY DISTRICT ATTORNEYS OFFICE, and ISMAEL PEASE to move BIGGERS divorce and protective order cases out of their proper Court with the intent of covering and

committing crimes against her. GUTIERREZ committed fraud when she refused to recuse herself from the case with full knowledge that she was having an affair with BIGGERS husband. In addition to having a sexual relationship with BIGGERS husband, GUTIERREZ was in a romantic relationship with BIGGERS childhood kidnapper. GUTIERREZ intended to kidnap BIGGERS children on behalf of the criminal enterprise from the start of the case. GUTIERREZ was aware that an extreme conflict of interest between her and BIGGERS existed before she had BIGGERS cases moved into her Court.

789. THE DEPARTMENT OF DEFENSE and THE ARMY INSPECTOR GENERAL committed fraud when they knowingly and intentionally falsely classified BIGGERS factual allegations against SIMS and his ARMY chain of command as "Unsubstantiated". The fraud by the INSPECTOR GENERAL is evident as SIMS plead guilty in BEXAR COUNTY TEXAS and was convicted of the same crime that THE ARMY INSPECTOR GENERAL claimed were unsubstantiated.

CLAIM FOR RELIEF 27:

GRAND THEFT AUTO

790. In August of 2005 CAPTAIN BRIAN KELLY aka JOHN ROBINSON aka HENRY MULEHEIM aka JARED COHEN committed the grand theft of BIGGERS 2000 Mitsubishi Eclipse in Tallahassee, Florida.
791. Next, with the assistance of the criminal enterprise, LORAINNE FRIAS, PATTI OLIVAS, and THE EL PASO COUNTY CONSTABLE, CAPTAIN BRIAN KELLY aka JOHN ROBINSON aka HENRY MULEHEIM aka JARED COHEN followed BIGGERS to El Paso Texas and committed the grand theft BIGGERS 2000 Jeep Grand Cherokee Laredo from BIGGERS driveway December 12th 2017.
792. During the month of November 2019, CAPTAIN BRIAN KELLY aka JOHN ROBINSON aka HENRY MULEHEIM aka JARED COHEN and the criminal enterprise committed the grand theft of BIGGERS Mercury Grand Marquis and her 2015 Chevy Equinox.
793. These acts of grand theft were terroristic in nature and done to leave the fingerprint of the criminal enterprise.

CLAIM FOR RELIEF 28:

WAGE THEFT

AS AGAINST: WHYNDHAM HOTELS, KURT ANGLE, WWE, DIXIE CARTER, IMPACT WRESTLING, CORINTHIAN COLLEGES, COLLEGECLUB APARTMENTS, BMI MANAGEMENT...

794. In 2020, THE RAMADA by WHYNDHAM HOTELS withheld, intercepted, stole, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
795. KURT ANGLE and PNC BANK withheld, intercepted, stole, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
796. The WWE withheld, intercepted, stole, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
797. DIXIE CARTER and IMPACT wrestling withheld, intercepted, stole, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
798. JILL MALONE, EVEREST UNIVERSITY, and CORINTHIAN COLLEGES withheld, intercepted, stole, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
799. TASHA VASQUEZ and COLLEGE CLUB APARTMENTS withheld, intercepted, committed the theft of, and used BIGGERS earnings, commissions, awards, and settlements without her knowledge and without her consent.

- 800. STAN BERNSTEIN and BMI MANAGEMENT withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, commissions, and settlements without her knowledge and without her consent.
- 801. JOHN HUETT unlawfully withheld, intercepted, committed the theft of , and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 802. DORIS HUETT WILLIAMS unlawfully withheld, intercepted, committed the theft of , and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 803. STEVE SHIPP, VERONICA SALINAS, and ALEX ABRAHANTES withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 804. THE MTV NETWORK withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 805. CLARENCE WILLIAMS withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 806. DIANA WASHINGTON HUETT withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 807. KAREN SMEDLY also known as KAREN JARRETT withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 808. NORRIS LAWRENCE withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 809. LARRY LAWRENCE withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.
- 810. HEATH WALLACE MILLER withheld, intercepted, committed the theft of, and used BIGGERS earnings, awards, and settlements without her knowledge and without her consent.

CLAIM FOR RELIEF 29:
ABUSE OF PROCESS

AS AGAINST: EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT

- 811. Each of the Defendants named in this section improperly used civil and or criminal proceedings for an unintended, malicious, and perverse reasons.
- 812. Each named Defendant deliberately and maliciously misused the civil and or criminal court process that cannot be justified by their underlying claims.
- 813. These actions were taken in bad faith and were done with the intent to delay the delivery of Justice.
- 814. The Defendants took these actions to create fear, and intimidate the Plaintiffs.
- 815. Furthermore the Defendants named in this Count took these actions to gain unfair and illegal advantaged over the Plaintiff.
- 816. The Defendants collectively engaged in a wide range of improper legal procedures to assist them in their goal of kidnapping, falsely imprisoning, and unlawfully dispossessing the Plaintiffs of their real and intellectual property.
- 817. The Defendants that participated in the defilement of the United States Justice system are as follows:

818. ALYSSA NAVA, JAIME ESPARZA, MARK SPINN, YVONNE ROSALES, ASHLEY MARTINEZ and BILL HICKS audaciously fabricated and falsified arrest warrants and indictments against BIGGERS for the intent of intimidating her, harassing her, and kidnapping her children.
819. PATTI OLIVAS, DAN OLIVAS and ASSOCIATES, JESUS URENDA, LORRAINE FRIAS, THERESA, EL PASO COLLABORATIVE pursued a baseless and unwarranted eviction lawsuit against BIGGERS. These Defendants initiated this lawsuit with the intention of unlawfully dispossessing BIGGERS of her home. BIGGERS defeated them in the eviction proceeding. Next, these Defendants went back to Court without any case being in existence and asked Judge URENDA to unlawfully dispossess the Plaintiffs of their home. Judge URENDA issued an illegal writ of possession to assist THERESA, FRIAS, EL PASO COLLABORATIVE, FELIX VALENZUELA, PATTI, and DAN OLIVAS and ASSOCIATES in unlawfully dispossessing the Plaintiffs of their home.
820. ASHLEY FULTON and XAVIER FULTON sought frivolous Orders of Protection against BIGGERS with the intent of kidnapping BIGGERS children.
821. When ASHLEY and XAVIER initiated this legal action they were aware that BIGGERS was not a threat to them whatsoever. XAVIER and ASHLEY were both stalking BIGGERS and in possession of BIGGERS other kidnapped children when they sought their frivolous Orders of Protection. They initiated these actions to assist them in kidnapping and unlawfully concealing BIGGERS children. BIGGERS was falsely imprisoned after being kidnapped when ASHLEY and XAVIER sought these orders.
822. MARY TREW and LIONEL JEAN BAPTISTE assisted ASHLEY and XAVIER in reaching their goal of kidnapping BIGGERS children by presiding over fictitious hearings and issuing knowingly void orders on their behalf. TREW and BAPTISTE were at all times fully aware that they did not have jurisdiction over any matters pertaining to BIGGERS children.
823. JOHN DOE 1-100 and JANE DOE 1-100 initiated legal proceedings against BIGGERS for the sole purpose of kidnapping BIGGERS children, having her falsely imprisoned, and unlawfully dispossessing her of her real and intellectual property.

CLAIM FOR RELIEF 30:

MAIL FRAUD

(18 U.S.C. § 1341)

824. The following named Defendants devised a scheme to defraud and intended to defraud BIGGERS of receipt of her mail for the purpose of executing an ongoing scheme.
825. These Defendants colluded and conspired against BIGGERS to further perpetuate their acts of Fraud:
826. KURT ANGLE unlawfully intercepted BIGGERS mail, opened the mail, concealed the fact that he was intercepting the mail, refused to give the mail to BIGGERS, intercepted BIGGERS contracts and paychecks, and deposited BIGGERS paychecks into his own account. This was done without BIGGERS consent or knowledge.
827. LARRY LAWRENCE and LARRY LAWRENCE unlawfully intercepted BIGGERS mail, opened the mail, concealed the fact that he was intercepting the mail, refused to give the mail to BIGGERS, intercepted BIGGERS contracts and paychecks, and deposited BIGGERS paychecks into their own account. This was done without BIGGERS consent or knowledge.
828. DORIS HUETT WILLIAMS and JOHN HUETT unlawfully intercepted BIGGERS mail, opened the mail, concealed the fact that he was intercepting the mail, refused to give the mail to BIGGERS, intercepted BIGGERS contracts and paychecks, and deposited BIGGERS paychecks into their own account. This was done without BIGGERS consent or knowledge.

829. SCOTT REID and HEATH MILLER unlawfully intercepted BIGGERS mail, opened the mail, concealed the fact that he was intercepting the mail, refused to give the mail to BIGGERS, intercepted BIGGERS contracts and paychecks, and deposited BIGGERS paychecks into his own account. This was done without BIGGERS consent or knowledge.
830. JOHN DOE 1-100 and JANE DOE 1-100 unlawfully intercepted BIGGERS mail, opened the mail, concealed the fact that they were intercepting the mail, refused to give the mail to BIGGERS, intercepted BIGGERS contracts and paychecks, and deposited BIGGERS paychecks into his own account. This was done without BIGGERS consent or knowledge

CLAIM FOR RELIEF 31:
ATTEMPTED MURDER

AS AGAINST: EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT

831. Plaintiffs hereby reincorporate and re-allege each paragraph of this complaint to be interpreted as fully re-written herein.
832. Each Defendant named in the entirety of this complaint was aware of and/or participated in the attempted murder of the Plaintiffs.
833. Each of the following named Defendants made incomplete and unsuccessful attempts to murder the Plaintiffs.
834. The Defendants named in the entirety of this complaint participated in and/or helped to conceal the attempted murder attempts.
835. Each Defendant had premeditated intent to kill the Plaintiffs and acted with reckless indifference for their lives.
836. The Defendants took multiple substantial direct steps towards killing the Plaintiffs.
837. The Defendants deployed a wide range of attempts to murder the Plaintiffs including poisoning them, hiring hitmen, and vehicular homicide.
838. Each Defendant named in the entirety of this complaint was aware of and concealed the 2008 attempted vehicular homicide of the Plaintiffs.
839. Each Defendant named in the entirety of this complaint was also aware of and concealed the attempted murder of BIGGERS in 2005 by WWE employees and MIKE KNOX.
840. DORIS HUETT WILLIAMS did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning. WILLIAMS also killed GENESIS, BIGGERS dog.
841. JOHN HUETT did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning. HUETT ordered the murder of GENESIS, BIGGERS' dog.
842. TIMOTHY MCGILL did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.
843. HEATH WALLACE MILLER did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning. HEATH MILLER stood in La Vera Pizza in Midtown, New York and confessed that he had "killed" BIGGERS after she had been poisoned. HEATH MILLER identified himself as "John" when he made the confession.
844. JOHN ROBINSON did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.
845. KURT ANGLE did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.

846. LARRY LAWRENCE did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.
847. NORRISE LAWRENCE did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.
848. VIRGINIA TRAVIS did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.
849. MEGAN PECHECCO attempted to murder BIGGERS and her children conceived through rape by poisoning them while they were roommates at Illinois Central College and basketball teammates.
850. DIEDRA COBB did colluded, conspired, and attempted to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.
851. ISMAEL PEASE, EPHRAM SIMS and the EL PASO COUNTY SHERIFF held a gun to BIGGERS head and pulled the trigger. The gun did not fire, however the attempt to murder BIGGERS in front of her children was made.
852. MICHAEL KNOXVILLE HETTINGA aka MIKE KNOX attempted to murder BIGGERS by intentionally breaking her neck.
853. JOHN DOE 1-100 did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.
854. JANE DOE 1-100 did collude and conspire to murder BIGGERS by vehicular homicide, hiring hitmen, as well attempting to murder BIGGERS, M.F. , and Z.S. by poisoning.

CLAIM FOR RELIEF 32:
SOLICITATION TO COMMIT A CRIME
(18 U.S.C § 373)

AS AGAINST: EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT

855. Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint as if fully re-written herein.
856. Whoever with the intent that another person engage in conduct constituting a felony that has an element of the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States has committed the offense of solicitation to commit a crime. If that person also operates under circumstances strongly corroborative of that intent, solicits, commands, induces, or otherwise endeavors to persuade another person to engage in such conduct, that person is liable for the solicitation of a crime. Each of the Defendants named in the entirety of this complaint have engaged in and continue to engage in the above described conduct against the Plaintiff's . These actions have continued up until the filing of this complaint.

CLAIM FOR RELIEF 33:
VIOLATION OF THE 5TH AND 6TH AMMENDMENTS

857. The Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint as if fully re-written herein.
858. The EL PASO COUNTY DISTRICT ATTORNEYS OFFICE and THE MANHATTAN DISTRICT ATTORNEYS office are currently and have previously violated the Plaintiffs 5th and 6th Amendment rights as the pursued fictitious criminal charges against BIGGERS concerning matters that had not yet been fully adjudicated.

859. The NYPD, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE EL PASO COUNTY SHERIFF, THE EL PASO CONSTABLE, SUFFOLK COUNTY, EL PASO COUNTY, NEW YORK COUNTY, THE STATE OF TEXAS and the STATE of NEW YORK have intentionally falsely arrested and falsely imprisoned BIGGERS multiple times without probable cause or any valid arrest warrant. These arrests and false imprisonment were based on crimes that were impossible for BIGGERS to commit.
860. BIGGERS was still litigating her divorce in the family Court including testifying on her own behalf . While BIGGERS was testifying concerning her final divorce decree, the EL PASO COUNTY DISTRICT ATTORNEY'S office was ordering her to be falsely arrest, falsely imprisoned, and kidnapped from New York claiming she had violated the family court Order that did not exist. **SEE DIVORCE APPEAL AND MOTION FOR NEW TRIAL**

CLAIM FOR RELIEF 34:

**VIOLATION OF 42 U.S.C. § 1985 CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS
AND 42 U.S.C § 1986 NEGLECTING TO PREVENT INTERFERENCE WITH CIVIL RIGHTS**

AS AGAINST: LAURA TAYLOR SWAIN, KURT ANGLE, DAVID WOLKINSON, BRUCE THARPE, STEPHANIE JAMES, TEXAS RIO GRANDE LEGAL AID, ALISON NEAL, YAHARA GUTIERREZ, SHANE ONEAL, YVONNE ROSALES, SAMUEL 'SAM' MEDRANO, ANGIE BARILL, VICTOR PARA, GREGORY ANDERSON, OUISA DAVIS, TEXAS ADVOCACY PROJECT, ALYSSA NAVA, JAIME ESPARZA, BILL HICKS, ALYSSA NAVA, MARK SPINN, LIONEL JEAN BAPTISE, HEATH WALLACE MILLER or HEATH MILLER, JOHN HUETT DORIS HUETT WILLIAMS, LARRY LAWRENCE, NORRIS LAWRENCE, MICHELLE BAILEY, GLEN JACOBS, GLEN FULTON, ALMA FULTON, AMANDA FULTON, CODY WILSON, MARCUS GRAY, LORI LIGHTFOOT, JOHN BUCHMILLER AND ASSOCIATES, CHICAGO LEGAL AID, THE CITY OF TAMPA, TAMPA POLICE DEPARTMENT, HENRY COUNTY GEORGIA, MCDONOUGH POLICE DEPARTMENT, ATLANTA POLICE DEPARTMENT, EL PASO POLICE DEPARTMENT, DEE MARGO, RICHARD WILES, THE EL PASO COUNTY SHERIFF, THE JACKSONVILLE ILLINOIS POLICE DEPARTMENT, MORGAN COUNTY SHERIFF, THE SHIRLEY NEW YORK POLICE DEPARTMENT, THE CENTER AGAINST SEXUAL AND FAMILY VIOLENCE, LA CASA, BRIGHTER TOMORROWS, THE HAMLET OF SHIRLEY, THE NEW YORK COUNTY SHERIFF, THE FBI, THE US MARSHALL SERVICE, THE STATE OF TEXAS, THE STATE OF NEW YORK, THE STATE OF ILLINOIS, THE STATE OF NEW JERSEY, NEW YORK ACS, THE ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES, TEXAS CHILD PROTECTIVE SERVICES, THE CENTER FOR MISSING AND EXPLOITED CHILDREN, THE ASSOCIATED PRESS, MOON TOWNSHIP, ALLEGHENY COUNTY, MICHAEL SANTICOLA, MICHELLE SANTICOLA, THE MOON TOWNSHIP POLICE DEPARTMENT, THE PITTSBURGH POLICE DEPARTMENT, ANGELA ZANE, DENISE DEMARCO, MARY MURRAY, MARY TREW, THE EL PASO TIMES, CRIMESTOPPERS, TROY BROWN, GENA ONLEY, VERONICA LERMA, EDUARDO LERMA, EDUARDO LERMA JR, VERONICA ESCOBAR, BETO O'ROURKE, BENITO TORRES, THE UNITED STATES OF AMERICA, THE DEPARTMENT OF DEFENSE, FORT BLISS, PAULA WHITE CAIN, ROBERT PAT WHITE, LEROY EKECHUCKWU, NICOLE GARCIA, BRIE GARCIA, SANDRA WRIGHT, ISAAC WRIGHT JR., TIKEALLA WRIGHT, AISHA CARR, DOMINIQUE KELSIE, SCOTT REID, DIXIE CARTER, LIBERTY INSURANCE, , SHAD KHAN, TONY KHAN, EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT, EACH DEFENDANT NAMED IN THE ENTIRETY OF THIS COMPLAINT, JOHN DOE 1-100 and JANE DOE 1-100

861. The Plaintiffs hereby re-allege and reincorporate each paragraph of this complaint as if fully re-written herein.

862. Acting as one body and one voice, each of the Defendants named in the entirety of this complaint secretly joined forces to accomplish their illegal scheme of interfering with the civil rights of the Plaintiffs, concealing interferences with the Plaintiffs civil rights, committing crimes against the Plaintiffs, concealing crimes committed against the Plaintiffs, allowing crimes to be committed against the Plaintiffs, and inflicting injuries upon the Plaintiffs persons and property.
863. Each of the Defendants named in the entirety of this Complaint impersonated Judges, Attorneys, Police officers, FBI Agents, Child protective Services workers, and a plethora of other state actors as they conspired to obstruct Justice and interfere with the Plaintiffs civil rights.
864. Each of the Defendants named in the entirety of this Complaint subjected the Plaintiffs to continuous acts of domestic terrorism to silence them and retaliate against them for seeking assistance from law enforcement and the Courts. These actions include but are not limited to interstate gang stalking, international stalking, kidnapping, international abduction, wiretapping, unlawful surveillance, human trafficking, molestation, rape, mutilation, the theft of organs, the theft of eggs, and attempted murder.
865. If not directly involved, each named Defendant in the entirety of this Complaint was aware of the Plaintiffs rights being violated, that crimes were being committed against them, and then chose to conceal these injustices. Each named Defendant intentionally failed to report the crimes they witnessed, lied to law enforcement about the crimes occurring, took steps to conceal the crimes, obstructed justice, intimidated/bribed witnesses, and intentionally failed to intervene.
866. The Defendants named throughout the entirety of this complaint did violate 42 USC 1986 as they had knowledge of the wrongdoings and the conspiracy against the Plaintiffs. Each of the Defendants named in the entirety of this complaint had the power to prevent or aid in preventing the wrongdoings, crimes, and civil rights violations committed against the Plaintiffs and intentionally failed to do so.
867. Each of the Defendants named in the entirety of this complaint violated 42 USC 1985 as they conspired to obstruct justice by attempting to deter the Plaintiffs from testifying by intimidation, force, blackmail, and threat.
868. Each Defendant named in the entirety of this Complaint attempted to intimidate the Plaintiffs by injuring their person and their property. Additionally, these Defendants secretly devised a scheme to deny the Plaintiffs proper access to the Courts, application of the United States Constitution, and to deny them proper access to the justice system as a whole.
869. The Plaintiffs have faced continuous acts of domestic terrorism at the hands of and on the watch of each Defendant named in the entirety of this Complaint.
870. Each named law enforcement agency Defendant in this Complaint refused to take a missing persons reports for the Plaintiffs kidnapped children, participated in their kidnappings, and showed a willful and deliberate indifference towards crimes committed against the Plaintiffs.
871. Each of the following state actor Defendants, and each state actor Defendant named in the entirety of this complaint collectively conspired to willfully and intentionally fail to intervene in crimes committed against the Plaintiffs, refused to intervene after being notified of civil rights violations committed against the Plaintiffs, actually partook in committing crimes against the Plaintiffs, and participated in violating the Plaintiffs civil rights.
872. Each law enforcement agency Defendant and all state actor Defendants including officers of the Court refused to enforce or even recognize Court orders to protect the Plaintiffs and furthermore assisted in violating those very Orders.
873. Each attorney and each Judge named in the entirety of this complaint secretly joined forces and devised a scheme to commit fraud upon the Court to the detriment of the Plaintiffs. Operating as one voice and one body, the attorneys and Judges named in the entirety of each paragraph of this complaint conspired to commit fraud upon the Court to reach their common goal of falsely

imprisoning, kidnapping, murdering, and interfering with the Plaintiffs Civil Rights under the color of law .

874. Each of the following named Defendants in this count and each Defendant named in the entirety of this complaint was aware of , participated in, and subsequently concealed the attempted murders of the Plaintiffs. Each of these Defendants were aware of the attempted murders before they happened and intentionally failed to intervene or request intervention.
875. The following Defendants secretly conspired to and did “blackball” the Plaintiffs out of professional wrestling, volleyball, basketball, athletics, the real estate industry, and the workforce as a whole denying the Plaintiffs right to work to advance their criminal enterprise. They also collectively conspired to deprive Plaintiffs of access to a college education.
876. The named Defendants also conspired to terrorize and to kidnap the Plaintiff and her children and to cover up the crimes of kidnapping. Each of the following named Defendants collectively conspired to steal the Plaintiffs organs, eggs, and mutilate their bodies.
877. The named Defendants participated in the conspiracy to have the Plaintiffs raped, molested, sex trafficked and concealed the sex crimes against the Plaintiffs. These actions were taken to intimidate the Plaintiffs who were witnesses to and victims of violent crimes.
878. The Defendants named in the entirety of this complaint conspired to falsely imprison the Plaintiffs in multiple states.
879. The following named Defendants participated in the conspiracy to steal the Plaintiffs identity to interfere with their civil rights by unlawfully dispossess them of their real property, commit the theft of their intellectual property, and to commit identity theft.
880. The following Defendants and the Defendants named in the entirety of this Complaint conspired to and did commit mortgage fraud, title fraud, and deed fraud against the Plaintiffs.
881. The following named Defendants and the Defendants named in the entirety of this complaint collectively conspired to tortuously interfere with the Plaintiffs business contracts and pending contracts.
882. The following named Defendants and the Defendants named in the entirety of this Complaint devised a secret scheme and collectively conspired to hack the Plaintiffs’ private electronic online accounts , delete emails, destroy evidence, and commit the theft of their electronic devices.
883. The following named Defendants and the Defendants named in the entirety of this complaint devised a secret scheme and collectively conspired to defame the Plaintiffs by knowingly and intentionally lying as they falsely asserted that the Plaintiffs were natural born males, strippers, pornographic actors, illiterate, mentally ill, kidnappers, drug addicted, and murderers.
884. The following named Defendants made deceitful agreements and worked in secret cooperation with the common goal of deceiving, misleading, and defrauding the Plaintiffs of finances, real property, education, access to justice, career opportunities, contracts, life , liberty, and their pursuits of happiness.
885. The named Defendants conspired to have the Plaintiffs physically assaulted, terrorized, kidnapped, falsely arrested and falsely imprisoned. Each of the following named defendants carried the conspiracy through to completion.
886. The following named Defendants’ collective attack targeted the Plaintiffs in multiple states , cities, and countries. The unwarranted and unlawful attacks were launched against the Plaintiffs in cities including but not limited Los Angeles California, Chicago Illinois, Houston Texas, New York, Tokyo Japan and Lagos Nigeria.
887. Each Defendant named in the entirety of this complaint acted as one body to devise a secret scheme to deprive the Plaintiffs of their civil rights by failure to intervene, outrageous violations of Due Process, false arrests, false imprisonments, fraud upon the Court, trespassing on the courthouse, malicious prosecution, creating fictitious charging instruments, and creating fictitious criminal cases.

888. Furthermore, these named Defendants participated in terrorizing the Plaintiffs with rape, blackmail, terrorizing the Plaintiffs with physical abuse, terrorizing the Plaintiffs with gang stalking, attempted murder, and outlandish abuses of power.
889. Each Defendant in the entirety of this complaint acted as one body to devise a secret scheme to deprive the Plaintiffs of their civil rights by failure to intervene, outrageous violations of Due Process, false arrests, false imprisonments, fraud upon the Court, trespassing on the courthouse, malicious prosecution, creating fictitious charging instruments, creating fictitious criminal cases ,and outrageous abuses of power.
890. The Plaintiffs hereby fully re-allege and reincorporate each paragraph of this complaint. Each paragraph and each named Defendant along with their described actions are to be reincorporated as if fully rewritten herein.
891. Each Defendant named in the entirety of this complaint conspired to and did actually wrongfully deprive the Plaintiffs of their right to life, liberty, and the pursuit of happiness. The Defendants also conspired to and did actually wrongfully deprive the Plaintiffs of their civil rights under the color of law. When the Plaintiffs sought Justice through the Courts they were further stalked, raped, kidnapped, sex trafficked, mutilated, falsely imprisoned, defamed, and unlawfully retaliated against by State Actors and co-conspiring civilians. The named Defendants also conspired to and did actually interfere with the Plaintiffs parent -child relationship by kidnapping BIGGERS by false arrest, kidnapping BIGGERS children/ co-Plaintiffs M.F. and Z.S., and then continuously unlawfully concealing them. Additionally, the named Defendants each collectively conspired to violate and did actually violate the Plaintiffs First, Fourth, and Fourteenth Amendment rights of the United States Constitution
892. After fleeing for their lives from Texas to New York the Plaintiffs ran into SDNY Chief Judge **LAURA TAYLOR SWAIN** when they sought help from the courts seeking redress for the continuous violations of their civil rights.
893. **LAURA TAYLOR SWAIN** revealed herself to be a leader in the conspiracy to deprive the Plaintiffs of their civil rights when she began stalking BIGGERS while she was a student at Florida State University. SWAIN has been stalking BIGGERS since approximately August 2003; posing as her roommate and dating BIGGERS boyfriends and BIGGERS family members. Next, SWAIN appointed herself to preside over this case with the intent to prevent the Plaintiffs from getting this complaint heard by a Jury as has been demanded. LAURA TAYLOR SWAIN has threatened the Plaintiffs that she will deny a trial by jury and order the clerk to enter a judgement in this matter if the Plaintiffs do not remove several of her co-conspirators from the defendants list. Because of LAURA TAYLOR SWAIN'S attempt to intimidate the Plaintiffs, the Plaintiffs have removed some of the names of the co-conspirators in this action. The Plaintiffs reserve the right to amend this complaint to re-add the additional Defendants back to this action. Furthermore, from the inception of this case LAURA TAYLOR SWAIN has continued to commit the high misdemeanor of the unlawful practice of law from the bench as she has blatantly acted as a defense attorney for her co-defendants.
894. On 10/13/2022 Chief Judge LAURA TAYLOR SWAIN appointed herself or was appointed to preside over the Plaintiffs case. When SWAIN appointed herself or was appointed to preside over the Plaintiffs case, she was aware that she was unable to participate in the matters due to the existence of extreme and overt conflicts of interest between herself and BIGGERS. If SWAIN for some reason was not initially aware of the preexisting conflicts of interest in the Plaintiffs case, she would have reasonably become aware of the conflict when she quizzically reviewed and inappropriately sua sponte dismissed a portion of the Plaintiffs federal civil rights complaint prematurely on 06/12/2023 without any Motions to Dismiss being filed.
895. After SWAIN inappropriately and prematurely sua sponte dismissed the Plaintiffs original federal civil rights complaint, the Plaintiff amended the document as the Court granted her leave to do so.

The Plaintiff submitted her 1st Amended complaint on 06/26/2023 along with an Order to Show Cause, Motion for Emergency Temporary Restraining Order, and Preliminary Relief. ON 06/30/ 2023 SWAIN deleted or instructed the SDNY PRO SE INTAKE UNIT to completely delete the docket entry from 06/26/2023 and all evidence of the Plaintiffs filings that day. The Pro Se intake unit has also listed the name of a minor child co-Plaintiff instead of BIGGERS as the lead Plaintiff in this case.

896. There exists a plethora of facts that clearly display that SWAIN is knowingly and intentionally presiding over the Plaintiffs case with the intent to obstruct justice, tamper with evidence, retaliate against BIGGERS, and participate in the conspiracy to interfere with the Plaintiffs civil rights. Multiple named Defendants in the Plaintiffs complaint have a close personal, intimate, and intricate relationship with SWAIN, including the Plaintiff BIGGERS herself. Furthermore SWAIN has a financial interest in the outcome of this case due to her ties to multiple businesses, organizations, and individual Defendants named in the Plaintiffs case.
897. Likewise, SWAIN is aware that she has a conflict of interest in presiding over any matter in which BIGGERS is a participant since SWAIN and BIGGERS were previously roommates and the fact that SWAIN dated BIGGERS ex boyfriend while they were roommates which caused their relationship to be contentious.
898. In this Complaint, the Plaintiff names multiple Judges who were her previous roommates for violation of 42 U.S.C. 1985- conspiracy to interfere with her civil rights, and also to violate the Plaintiffs Fourteenth Amendment right to Due Process of Law. The Plaintiff named these Judges in her lawsuit because each of them were her previous roommates, co-workers, and teammates before presiding over her cases just as LAURA TAYLOR SWAIN is doing. Each Judge named by BIGGERS dramatically changed their physical appearance, then they each placed themselves in a position to preside over the Plaintiffs cases just as SWAIN has.
899. To name a few , JESUS RODRIGUEZ, RUTH REYES aka REBECCA REYES, and ANGIE BARILL were all previous roommates of the Plaintiff.
900. RUTH REYES aka REBECCA REYES was the Plaintiffs co-worker at Lucha Libre Masked Warriors and also her roommate while on tour. The Plaintiff also attended REYES baby shower, and was invited to her wedding. Despite these facts, REYES appointed herself to the Plaintiffs cases, falsely arrested/ imprisoned the Plaintiff, and committed Fraud Upon the Court in the Plaintiffs cases. REYES took these actions to assist in the kidnapping of the co-Plaintiffs.
901. ANGIE BARILL was the Plaintiffs basketball teammate , classmate from kindergarten- high school, and roommate. ANGIE BARILL placed herself on the Plaintiffs case in El Paso Texas to assist the criminal enterprise in intentionally falsely imprisoning and kidnapping the Plaintiff.
902. JESUS RODRIGUEZ was the Plaintiffs roommate in college as well as fraternity brothers and best friends with the Plaintiffs ex-boyfriend John William Robinson. JESUS RODRIGUEZ disregarded these facts and placed himself to preside over the Plaintiffs family law case to assist the criminal enterprise in kidnapping the co-Plaintiffs.
903. Being that SWAIN was the Plaintiffs former roommate, just as these Judges were, the only logical explanation is that these individuals have devised a secret scheme and collectively agreed to interfere with and to deprive the Plaintiffs of their civil rights. SWAIN is unethically retaining this case in her Court so that she can conduct discovery for the Defendants , destroy evidence, tamper with evidence, interfere with the Plaintiffs complaint making it to trial, conceal the crimes of the criminal enterprise, and interfere with the rescue of the kidnapped co-Plaintiffs M.F. and Z.S. Since

SWAIN has not recused herself voluntarily, there is no reason to believe that SWAIN is not a member of the criminal enterprise.

904. The fact that Judge SWAIN is fully aware that she has an extreme pre-existing conflict of interest as in these matters since her and the Plaintiff previously lived together, her presence on this case alone is causing the Plaintiffs to be deprived of Due Process of law in violation of 42 U.S.C. 1983.
905. By intentionally and knowingly presiding over the Plaintiffs case with a conflict of interest, as well as a financial interest in the outcome of this case based upon her relationships with her co-defendants; Judge LAURA TAYLOR SWAIN is depriving the Plaintiffs of their civil rights under the color of law , acting as a co-conspirator with the Defendants named in the case she is presiding over, violating the Plaintiffs Due Process clause pursuant to the Fourteenth Amendment of the United States Constitution, and conspiring to interfere with the Plaintiffs civil rights.
906. It can reasonably be concluded the LAURA TAYLOR SWAIN is a spearhead in the conspiracy to deprive the Plaintiffs of their civil rights, and that the confidence of her co-conspirators to go to war against the United States Constitution is derived from this fact.
907. Prior to LAURA TAYLOR SWAIN revealing herself to be a leader in the Conspiracy to interfere with the Plaintiffs civil rights, the Plaintiffs found themselves in a fight for Justice against ROBERT "PAT" WHITE, the UNITED STATES ARMY, and multiple law enforcements agencies throughout the United States. This corrupt criminal enterprise along with SDNY Chief Judge LAURA TAYLOR SWAIN has intentionally compromised the safety of the Plaintiffs and intentionally obliterated their protections afforded by the United States Constitution.
908. There are multiple law enforcement agencies from a variety of States named throughout this complaint. Each of the state actors and agencies colluded and conspired with THE MANHATTAN DISTRICT ATTORNEY'S OFFICE , THE SUFFOLK COUNTY DISTRICT ATTORNEY'S OFFICE, the NEW YORK POLICE DEPARTMENT , THE EL PASO DISTRICT ATTORNEYS OFFICE ,and THE STATE OF TEXAS to deprive the Plaintiffs of their civil rights.
909. The Defendants names in the entirety of this complaint participated in the conspiracy as detailed in each paragraph of this complaint and as follows:
910. Together as a cohesive unit and severely, HUETT, ANGLE, JACKSON, WILLIAMS, LARRY LAWRENCE and NORRIS LAWRENCE drugged, molested, sex-trafficked, raped, assaulted, mutilated, stalked, defrauded, extorted, sex trafficked, burglarized and attempted to frame the Plaintiffs for crimes.
911. HUETT, ANGLE, WILLIAMS, LARRY LAWRENCE and NORRIS LAWRENCE and acted as the hands, legs and feet of the terroristic criminal enterprise as they continued the criminal acts against BIGGERS and her children.
912. HUETT, WILLIAMS, LARRY LAWRENCE and NORRIS LAWRENCE kidnapped BIGGERS when she was an infant and began building a false world for BIGGERS to grow up in.
913. HUETT fraudulently represented himself as BIGGERS biological father because he had the intent to rape, impregnate, and murder her from the time she was an infant.
914. HUETT carried out his heinous plans for BIGGERS and began raping her around the age of 3 or 4 years old.
915. Instead of fairy tales, LARRY, NORRIS, HUETT, and WILLIAMS forced BIGGERS to watch pornographic movies and read pornographic magazines starting at the age of 2.
916. NORRIS LAWRENCE fraudulently represented herself to be BIGGERS biological mother. NORRIS and HUETT kidnapped BIGGERS from Carle hospital immediately after her birth with the intent to rape, impregnate, sex traffic, and murder her.
917. NORRIS began raping BIGGERS around the age of 2 years old.

918. LARRY LAWRENCE posed as BIGGERS stepfather after assisting in her childhood kidnapping. LARRY began drugging and raping BIGGERS around the age of 9 years old.
919. DORIS HUETT WILLIAMS fraudulently posed as BIGGERS grandmother. WILLIAMS began drugging and raping BIGGERS during her childhood as well.
920. The terrorist organization succeeded in impregnating BIGGERS around the age of 9.
921. Next, HUETT, NORRISE, LARRY, and WILLIAMS stalked BIGGERS and violently ripped the babies from her womb.
922. HUETT, NORRISE, LARRY, and WILLIAMS then asserted to the media and anyone who would listen that BIGGERS had murdered her children.
923. After accusing BIGGERS of murdering the children that they kidnapped; HUETT, NORRISE, LARRY, and WILLIAMS recruited and retained the assistance of a legion of co-conspirators to conceal their savage crimes and to silence BIGGERS forever by killing her.
924. HUETT, LARRY, NORRISE, , and WILLIAMS collectively agreed to kidnap, molest ,and sex traffic BIGGERS as a child, kidnap BIGGERS children, beat her with belts, fists, and sticks, stalk and sabotage BIGGERS education with the goal of traumatizing BIGGERS so that they could steal BIGGERS inheritance and her property.
925. NORRISE LAWRENCE showed up in Manhattan housing court attempting to interfere with BIGGERS access to counsel in an eviction lawsuit in 2022.
926. LARRY LAWRENCE, PAULA WHITE, HEATH MILLER, ISAAC WRIGHT JR.,JOHN HUETT , and XAVIER FULTON placed hidden cameras in the Plaintiffs private residence, unlawfully wire tapped their electronic devises, and broadcast private moments of the Plaintiffs in their home without their knowledge or consent.
927. HUETT, LARRY, NORRISE, and WILLIAMS selected KURT ANGLE, HEATH MILLER, JOHN ROBINSON, TIMOTHY MCGILL, EPHRAM SIMS, and XAVIER FULTON to lead the multifaceted violent sexual attack on BIGGERS life after BIGGERS escaped their houses of horror.
928. Each of these individuals agreed to and did intentionally inflict harm upon the Plaintiffs with the intent of severely traumatizing them so that they could not seek justice by any means.
929. ANGLE willingly accepted the assignment and became the face of and joint head of the criminal enterprise's attack on the Plaintiffs.
930. ANGLE being the face of the terrorist organization made it possible for their criminal enterprise to expand as they conspired to execute the criminal missions that targeted the Plaintiffs as detailed in the following paragraphs.
931. The conspirators began to reveal themselves in Courts of law to BIGGERS with the appearance of DANA LEVINE and TODD ELLIOT.
932. DANA LEVINE and TODD ELLIOT conspired with the criminal enterprises' operation in Allegheny County, Pennsylvania. LEVINE and ELLIOT agreed to offer BIGGERS private legal representation with no intent of helping her. LEVINE'S intent was to conduct discovery for opposing counsel, assist ANGLE in evading justice, silence BIGGERS, obstruct justice, and to cause BIGGERS irreparable harm.
933. LEVINE pressured and intimidated BIGGERS into settling the protective order outside of the Court room, and told her she would secure a 10 year order of protection against ANGLE if she forwent the Judicial proceedings.
934. After BIGGERS did secure an Order of Protection against ANGLE, LEVINE intentionally failed to supply BIGGERS with a copy of the Order so that ANGLE freely could stalk, harass, abuse and attempt to kill BIGGERS.
935. TODD ELLIOTT assisted the ALLEGHENY COUNTY Prosecutors office in committing fraud upon the Court in ANGLE'S stalking case as well as ANGLES domestic violence cases.

936. KURT ANGLE stalked BIGGERS across multiple states, drugged her, raped her, and kidnapped her children. KURT ANGLE is currently still stalking BIGGERS as of 2023, and has moved in next door to her in New York City. KURT colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. KURT is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. KURT participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. KURT was aware of and participated in the attempted murders of the Plaintiffs. Additionally, KURT colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. KURT and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
937. MICHAEL SANTICOLA did operate as a spearhead in the conspiracy to obstruct justice and deprive the Plaintiffs of their civil rights when he, as ALLEGHENY COUNTY SOLICITOR, went on media outlets and defamed BIGGERS while she was the listed crime victim in his court. MICHAEL SANTICOLA was unlawfully privately retained as ANGLE's personal attorney at the same time that he was serving as ALLEGHENY COUNTY solicitor. SANTICOLA had as well visited ANGLE and BIGGERS private residence after BIGGERS reported being bitten in the face by ANGLE to the PITTSBURGH POLICE DEPARTMENT to intimidate her. SANTICOLA denied BIGGERS access to all crime victims rights and services provided to crime victims by the ALLEGHENY COUNTY PROSECUTORS office. SANTICOLA's acts of collusion and conspiracy continued as he intentionally and knowingly sabotaged the criminal case against ANGLE by having his wife, MICHELLE SANTICOLA (who BIGGERS knew previously as CAMERON HAVEN) represent ANGLE while he sat directly behind ANGLE during the criminal proceedings.
938. MICHAEL SANTICOLA suppressed evidence, intimidated witnesses, and targeted BIGGERS for the advancement of ANGLE's criminal enterprise. Additionally, ANGLE paid ALLEGHENY COUNTY SOLICITOR MICHAEL SANTICOLA \$500 / hour to target, harass, defame and terrorized BIGGERS.
939. While working in the ALLEGHENY COUNTY PROSECUTORS OFFICE, and while serving as Allegheny County Solicitor; MICHAEL SANTICOLA audaciously did television interviews and issued press releases to newspapers that BIGGERS was " liar" and that her reports of stalking and abuse were "completely made up stories". When MICHAEL SANTICOLA made these statements he was willfully, intentionally, and knowingly lying with the intent to obstruct justice in the criminal cases against ANGLE in his office. SANTICOLA took these actions to cause BIGGERS irreparable harm to her life and her reputation.
940. MICHAEL SANTICOLA also solicited his wife, attorney MICHELLE SANTICOLA aka CAMERON HAVEN to participate in the conspiracy against BIGGERS. MICHELLE intentionally and knowingly blatantly defamed BIGGERS to the media, assisted the ALLEGHENY COUNTY PROSECUTORS OFFICE in committing fraud upon the Court, and did not keep candor with the tribunal during her unethical representation of ANGLE. MICHELLE SANTICOLA, aka CAMERON HAVEN targeted BIGGERS in Allegheny County after she stalked, monitored, sabotaged, and attempted to sex traffic BIGGERS while the two women were "friends" at Florida State University.
941. THE ALLEGHENY COUNTY DISTRICT ATTORNEYS' OFFICE colluded and conspired against BIGGERS civil rights when they assisted in the execution and cover up of crimes that ANGLE committed against BIGGERS. They refused to inform BIGGERS of Court dates, as well as tampered with and destroyed incriminating evidence against ANGLE. THE ALLEGHENY COUNTY DISTRICT ATTORNEYS' OFFICE conspired to and did deny BIGGERS crime victim services, crime victims' rights, and civil rights for the advancement of ANGLE'S criminal enterprise.
942. Bexar County District Attorney AUSTIN HAGEE, MATTHEW HAGEE and THE BEXAR COUNTY DISTRICT ATTORNEYS OFFICE vigorously and audaciously conspired to violate and interfere with the Plaintiffs civil rights. After SIMS was charged with beating BIGGERS unconscious AUSTIN HAGEE and

the BEXAR COUNTY DISTRICT ATTORNEY published BIGGERS name on the docket, committed fraud upon the Court, and assisted SIMS in getting released early from probation although they were aware that he was stalking and attempting to kidnap and kill the Plaintiffs.

943. SHAD KHAN colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. SHAD is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. SHAD participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. SHAD was aware of and participated in the attempted murders of the Plaintiffs. Additionally, SHAD colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. SHAD and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
944. JOHN HUETT did collude and conspire against BIGGERS and her children to deprive them of their civil rights ,to silence them, and to subject them to his criminal pedophile activities and violent crimes.
945. HUETT conspired with DORIS HUETT WILLIAMS, LARRY LAWRENCE and NORRIS LAWRENCE to permanently emotionally damage the Plaintiffs by physically abusing and molesting her has a child.
946. After raping BIGGERS and violently ripping the children conceived through rape from BIGEGRS womb, HUETT went on to gang stalk BIGGERS, interfere with and sabotage BIGGERS employment contracts, court proceedings, sabotage and interfere with BIGGERS personal relationships, solicit others to rape BIGGERS, solicit others to terrorize and burglarize BIGGERS , and solicited men to repeatedly punch BIGGERS on behalf of himself and KURT ANGLE in the face for the advancement of the criminal enterprise.
947. JOHN HUETT kidnapped and sex trafficked BIGGERS children. HUETT interfered with BIGGERS court proceedings and bribed attorneys and Judges to break the law. HUETT colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. HUETT is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. HUETT participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. HUETT was aware of and participated in the attempted murders of the Plaintiffs. Additionally, HUETT colluded with a vast network of co-conspirators to repeatedly unlawfully dispossess the Plaintiffs of their intellectual and real property. HUETT and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise.
948. ALL ELITE WRESTLING ,”AEW” WORLD WWE’S DEEP SOUTH WRESTLING”, and IMPACT WRESTLING colluded and conspired to murder BIGGERS, conceal the attempts to murder her, deny her access to the Courts, and to blackball her from the pro wrestling industry.AEW, WWE, and IMAPCT WRESTLING are covert human trafficking operations and corrupt criminal enterprises. AEW, WWE, and IMPACT colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. AEW, WWE, and IMPACT are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
949. AEW, WWE, and IMPACT orchestrated the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children.

950. AEW, WWE, and IMPACT were aware of and participated in the attempted murders of the Plaintiffs through poisoning, attempted vehicular homicide, and employing hitmen.
951. AEW, WWE, and IMPACT sent their employees and representatives to impersonate judges and attorneys to deny the Plaintiffs access to fair and unbiased court proceedings.
952. Additionally, AEW, WWE, and IMPACT colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. AEW, WWE, and IMPACT and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce as a whole. These actions were taken to silence the Plaintiffs for the advancement of their criminal enterprise.
953. IMPACT WRESTLING further colluded when they attempted to defame BIGGERS, blackball her from the pro wrestling industry, and retaliated against her by breaching her contract and firing her for reporting the crimes that ANGLE committed against her to law enforcement.
954. FACEBOOK , TWITTER, and INSTAGRAM conspired with the criminal enterprise when they knowingly and intentionally tampered with and destroyed evidence in Plaintiffs accounts and deleted the contents of the Plaintiffs accounts on their Platforms.
955. FACEBOOK, TWITTER and INSTAGRAM refused to verify the Plaintiffs accounts in an attempt to violate the Plaintiffs 1st amendment right of free speech and to conceal the crimes of the criminal enterprise committed against the Plaintiffs.
956. FACEBOOK, TWITTER and INSTAGRAM refused to verify the Plaintiffs accounts although they required her to use a government issued ID to even access her account.
957. GOOGLE, HOTMAIL, and YAHOO participated in the conspiracy to violate the Plaintiffs civil rights by locking the Plaintiffs out of their accounts, deleting their accounts , deleting their emails, granting unauthorized access to their accounts, and using their accounts to stalk the Plaintiffs.
958. WINDY LAURA WILLIAMS kidnapped the Plaintiffs children. WINDY colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. WINDY is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. WINDY participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. WINDY was aware of and participated in the attempted murders of the Plaintiffs. Additionally, WINDY colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. WINDY and her co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
959. DORIS HUETT WILLIAMS kidnapped the Plaintiffs children. WILLIAMS colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. WILLIAMS is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. WILLIAMS participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. WILLIAMS was aware of and participated in the attempted murders of the Plaintiffs. Additionally, WILLIAMS colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. WILLIAMS and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise.

960. LARRY LAWRENCE kidnapped, raped, and mutilated the Plaintiff and her children. LARRY unleashed hell upon BIGGERS for reporting him locking her in a basement to the police when she was around 5 years old. LARRY stalked BIGGERS to her college campuses, drugged and raped her. LARRY colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. LARRY is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally participated in the kidnappings, and unlawfully concealed the location of the kidnapped children. LARRY participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. LARRY was aware of and participated in the attempted murders of the Plaintiffs. Additionally, LARRY colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. LARRY sabotaged BIGGERS grades, college scholarships, and professional contracts. LARRY and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
961. NORRIS LAWRENCE kidnapped and raped the Plaintiffs. NORRIS mutilated the Plaintiffs children. NORRIS colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. NORRIS is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. NORRIS participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. NORRIS was aware of and participated in the attempted murders of the Plaintiffs. Additionally, NORRIS colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. NORRIS and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
962. DIANA WASHINGTON HUETT colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. DIANA is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. DIANA participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. DIANA was aware of and participated in the attempted murders of the Plaintiffs. Additionally, DIANA colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. DIANA and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
963. TIMOTHY MCGILL stalked BIGGERS from Illinois to Florida to New York to intimidate her into not seeking remedy through the Court for the injustices she suffered. TIM molested and sex trafficked BIGGERS when she was approximately 11 years old. MCGILL colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. MCGILL is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
964. Judge LIONEL JEAN BAPTISE Ordered and concealed the kidnapping of the Plaintiffs. LIONEL colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. LIONEL is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped

children. LIONEL participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. LIONEL was aware of and participated in the attempted murders of the Plaintiffs. Additionally, LIONEL colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. LIONEL and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing the Plaintiffs from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise .

965. Former District Attorney JAIME ESPARZA revealed himself as a participant in the criminal enterprise's conspiracy to interfere with the Plaintiffs civil rights when he supported the pursuit of fictitious criminal charges against BIGGERS initiated out of the EL Paso County District Attorneys office.
966. ESPARZA was fully aware that no grand jury indicted BIGGERS and that no Judge had signed any warrant for her arrest to initiate the criminal case. ESPARZA and his office intentionally fabricated charging instruments since none had been legally obtained. ESPARZA ignored these facts and proceeded to go to war against the United States Constitution by having BIGGERS and her children kidnapped from Brighter Tomorrows domestic violence shelter by the SHIRLEY NEW YORK POLICE DEPARTMENT. The children were then kidnapped by airplane from New York City. ESPARZA ordered BIGGERS to be kidnapped by Prison Transport Systems across state lines from New York to El Paso. After it became blatantly obvious to ESPARZA that he had no authority to arrest or extradite BIGGERS, he decided to continue his illegal and malicious prosecution of BIGGERS and instructed the El Paso District Attorneys Office to "not let the case against BIGGERS go" no matter what.
967. After kidnapping BIGGERS, M.F. and Z.S., **BIDEN** rewarded ESPARZA for committing his crimes by appointing ESPARZA to the seat of UNITED STATES ATTORNEY for the Western District of Texas.
968. ESPARZA took the actions detailed in this complaint because he is at war against the United States Constitution for the advancement of **KURT ANGL'S** enterprise .
969. Judge YAHARA GUTIERREZ was having a sexual relationship with the Plaintiffs husband and childhood kidnapper. For this reason, YAHARA moved BIGGERS case into her court room to assist in kidnapping of BIGGERS children. YAHARA savagely retaliated against the Plaintiffs for legally challenging her abuses of discretion and her abuses of power through legal Motions. ***See Appeal and Motion For New Trial.*** After being recused from the Plaintiffs family law case, YAHARA ordered the kidnapping of M.F. and Z.S. from New York City.
970. Former EL PASO DISTRICT ATTORNEY YVONNE ROSALES did collude and conspire against BIGGERS and her children when she committed fraud upon the court to maintain and pursue a fictitious criminal case against BIGGERS. In October of 2022, ROSALES attempted to have BIGGERS kidnapped by false arrest from New York City for the second time. ROSALES was fully aware that no warrant was ever issued for BIGGERS arrest, and that BIGGERS was never indicted. Regardless of these fact, ROSALES continued to work to obtain a wrongful conviction against BIGGERS until she was forced to resign from office for corruption and incompetency.
971. As of today, 06/18/2023; EL PASO DISTRICT ATTORNEY BILL HICKS is currently colluding and conspiring to kidnap BIGGERS from New York City. HICKS is seeking to secure a wrongful conviction stemming from the poisonous tree of a fictitious indictment just as ROSALES, NAVA, SPINN, and ESPARZA did. Governor Greg Abbot appointed HICKS as District Attorney after ROSALES' forced resignation. HICKS is and was aware that BIGGERS was never indicted, that no valid warrant was issued for her arrest, and that the entire criminal case against BIGGER was fictitious and conceived through fraud. Regardless of these facts, HICKS has chosen to continue and carry out the conspiracy to falsely imprison BIGGERS based off of a fictitious case.
972. Former Assistant District Attorney ALYSSA NAVA was BIGGERS' former co-worker on the set of the Lionsgate film "WARRIOR" in Pittsburgh , Pennsylvania. The next time BIGGERS saw NAVA she had fabricated a fictitious felony indictment against BIGGERS and ordered the kidnapping of BIGGERS

and her children from Brighter Tomorrows domestic violence shelter. NAVA participated in the criminal conspiracy when she began stalking BIGGERS in Pittsburgh and then became an assistant district attorney with the intent of falsely imprisoning BIGGERS and kidnapping her children. NAVA further carried out the conspiracy when she continued to pursue the fictitious charges against BIGGERS until she was no longer employed by the El Paso County District Attorneys Office.

973. Assistant District Attorney ASHLEY MARTINEZ is currently colluding and conspiring to deprive the Plaintiffs of their civil rights by knowingly and intentionally pursuing criminal charges against BIGGERS without any indictment, warrant, or credible witness. Identifying herself as "Melody", MARTINEZ previously informed BIGGERS that she was having an affair with BIGGERS husband, that she refused to be "the side chick" and that she has a child named "Judah" via Facebook messenger. Since being assigned this case MARTINEZ has requested that BIGGERS be falsely imprisoned multiple times and furthermore threatened to bring additional frivolous and retaliatory criminal charges against BIGGERS for the advancement of her and her co-conspirators criminal enterprise.
974. Attorney DAVID WOLKINSON presented himself to BIGGERS as wanting to provide her legal services with no intent of assisting her. WOLKINSON'S intent was to spy on, surveille, stalk the Plaintiffs, and to obstruct justice. WOLKINSON was leading the charge to silence the Plaintiffs, suppress and destroy evidence, and to ensure that no one learned of the crimes that the criminal enterprise committed. At the time WOLKINSON made this offer for legal representation he was working with RICHARD BRUCE THARPE as lead counsel of the criminal enterprise. WOLKINSON subsequently made multiple personal attempts to murder the Plaintiffs in New York City by poisoning them.
975. NEW YORK ACS and THE NEW YORK OFFICE OF CHILDREN AND FAMILY SERVICES intentionally and knowingly kidnapped M.F. and Z.S. from BIGGERS when they superseded the judicial process for removal of a child and granted "custody" of M.F. and Z.S. to their abusers.
976. TEXAS CHILD PROTECTIVE SERVICES did collude and conspire to deprive BIGGERS, M.F., and Z.S. of their civil rights as they knowingly and intentionally failed to intervene in BIGGERS family violence case against SIMS. TEXAS CHILD PROTECTIVE SERVICES via Judge YAHARA GUTIERREZ ordered the kidnappings of M.F. and Z.S. from New York City. TEXAS CHILD PROTECTIVE SERVICES turned a blind eye to their own findings of child abuse, domestic violence, and neglect against SIMS. Next, they assisted in the stalking and kidnapping of M.F., Z.S., and BIGGERS to conceal crimes, cover their unethical practices, and advance the criminal enterprise.
977. Texas Child Protective Services Agent INEKE AALDERTS did collude and conspire to deprive BIGGERS, M.F., and Z.S. of their civil rights as she knowingly and intentionally failed to intervene in BIGGERS family violence case against SIMS. AALDERTS was operating for the criminal enterprise on behalf of HEATH MILLER. AALDERTS was aware through her investigation on behalf of TEXAS CHILD PROTECTIVE SERVICES that BIGGERS had been beaten unconscious, raped by ANGLE and SIMS in front of the children. AALDERTS was aware that BIGGERS and her children were being stalked. Instead of helping BIGGERS, AALDERTS assisted the criminal enterprise in stalking, harassing, kidnapping, defamation, human trafficking, and re-victimizing BIGGERS and her children. AALDERTS assisted in the kidnapping of M.F. and Z.S., and refused to give BIGGERS a safety plan after the case was initiated and findings of abuse and neglect had been substantiated.
978. THE DEPARTMENT OF DEFENSE, "D.O.D" encouraged and concealed the crimes of gang rape, drugging, and attempted murder by DOD employees of the Plaintiffs. The DEPARTMENT OF DEFENSE also encouraged, concealed, and supported the fraudulent enlistment of ANGLE, ROBINSON, AND SIMS into the UNITED STATES ARMY with the intent of having these individuals rape and murder the Plaintiffs. The DEPARTMENT OF DEFENSE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. The DEPARTMENT OF DEFENSE is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the

kidnappings, and unlawfully concealed the location of the kidnapped children. The DEPARTMENT OF DEFENSE participated in the conspiracy to rape, molest, falsely imprison, and sex traffic the Plaintiff and her children. The DEPARTMENT OF DEFENSE was aware of and participated in the attempted murders of the Plaintiffs. Additionally, The DEPARTMENT OF DEFENSE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. The DEPARTMENT OF DEFENSE and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise.

979. WILLIAM BEAUMONT ARMY MEDICAL CENTER did collude and conspire against BIGGERS and her children when their practitioners presented BIGGERS with fake sonogram images to conceal a multi-child pregnancy, coordinated and assisted in the kidnapping of BIGGERS newborn children, concealed the kidnappings, concealed the sexual assaults and the rapes BIGGERS reported to them.
980. JOHN WILLIAM ROBINSON aka CAPTAIN BRIAN KELLY aka HENRY MULEHEIM, aka JARED COHEN did collude and conspire to further the criminal enterprise when he unlawfully gained entry to BIGGERS labor and delivery room at WILLIAM BEAUMONT ARMY MEDICAL CENTER, and kidnapped BIGGERS children directly from her womb. ROBINSON reappeared as "CAPTAIN BRIAN KELLY" and impersonated a military attorney working on BIGGERS behalf to obstruct justice and conceal military crimes. ROBINSON reappeared and presented himself as JARED COHEN and as HENRY MULEHEIM ;legal assistants for NEW YORK LEGAL ASSISTANCE GROUP. ROBINSON acting as COHEN and MULEHEIM blocked BIGGERS access to legal assistance after NYLAG accepted her application for assistance in filing this lawsuit.
981. JUSTIN UNDERWOOD did collude and conspire against BIGGERS and her children's civil rights when he agreed to represent BIGGERS in the fraudulent criminal case. After his initial consultation with BIGGERS, UNDERWOOD discovered that there was no active warrant, that no grand jury indicted BIGGERS, and that the news reports of BIGGERS being EL Paso's Most Wanted were fake. Instead of assisting BIGGERS, UNDERWOOD asked BIGGERS if she had been a professional wrestler and then vanished in efforts to conceal the criminal activity of **ANGLE'S** criminal enterprise.
982. Judge ANGIE BARILL was previously BIGGERS roommate and basketball teammate. BARILL revealed herself to be participating in the conspiracy to interfere with the Plaintiffs civil rights. BARILL came out of retirement to accept appointment to the fraudulent criminal case against BIGGERS issued from the El Paso 409th District Court. BARILL was and is currently attempting to kidnap BIGGERS from New York City by false arrest. BARILL is fully aware that BIGGERS was never indicted and that no original warrant for her arrest was ever issued. It is also obvious that BARILL is knowingly and intentionally violating the Judicial Code of Ethics by accepting appointment to BIGGERS case. At all times, Judge BARILL was aware that BIGGERS was her classmate, basketball teammate, and roommate. BARILL turned a blind eye to the fact that BIGGERS and her children had been kidnapped by the State of Texas, that BIGGERS was never indicted, that no grand jury ever met, and that no Judge signed any warrant for BIGGERS arrest to summons her to BARILL'S Court. BARILL then went on to unethically hand select court appointed attorneys to that she believes will assist her and the criminal enterprise in completing the conspiracy. BARILL agreed to target BIGGERS, conceal crimes committed by the State of Texas, and deprive BIGGERS and her children of their civil rights. Furthermore, Judge BARILL violated BIGGERS HIPPA when she sua sponte ordered a competency evaluation by a physician for BIGGERS and made the results available to the Court. BARILL had full knowledge that the charging instruments and case were fictitious, yet she still issued a knowingly fictitious warrant for BIGGERS arrest in the interest of kidnapping and falsely imprisoning her again December 12th 2022.
983. SAMUEL 'SAM' MEDRANO JR was the initial Judge over the fraudulent criminal case against BIGGERS. MEDRANO colluded with the criminal enterprise when he had BIGGERS and her children kidnapped from New York. Although MEDRANO was fully aware that BIGGERS had never been

indicted and that no warrant was signed for her arrest, he refused to dismiss the criminal case . Next, MEDRANO attempted to put an ankle monitor on BIGGERS although she had never been indicted or charged with any crime. MEDRANO went on to put BIGGERS on electronic monitoring although he was fully aware that BIGGERS was never indicted or charged with any crime. MEDRANO issued illegal custody orders for Z.S. against BIGGERS from his criminal court. MEDRANO'S orders directly violated the Family Court Orders his Court was attempting to illegally criminally enforce. MEDRANO had no jurisdiction on the family court case, and the Order issued by MEDRANO is evidence of MEDRANO kidnapping Z.S. while accusing BIGGERS of that very offense. MEDRANO issued fictional warrants for BIGGERS arrest, sent the UNITED STATES MARSHALL SERVICE and the NYPD to BIGGERS New York City apartment, and had her falsely imprisoned at RIKERS ISLAND. Just a BARILL did, MEDRANO hand selected attorneys for BIGGERS case who he believed would assist in accomplishing the goal of kidnapping BIGGERS by false arrest , and false imprisonment. MEDRANO and BARILL are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MEDRANO and BARILL participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. MEDRANO and BARILL were aware of and participated in the attempted murders of the Plaintiffs

984. HOPE ELAM HUETT kidnapped BIGGERS children. HOPE is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. HOPE was aware of and participated in the attempted murders of the Plaintiffs. HOPE colluded and conspired with the criminal enterprise to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. Additionally, HOPE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. HOPE and the additional co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
985. CRAIG SHEPPARD WRIGHT aka ALFREDO ALDERETE stole the keys to BIGGERS Tampa apartment and assisted in her illegal lockout from Grand Central Kennedy. WRIGHT stalked BIGGERS on behalf of the criminal enterprise and assisted ANGLE in breaching BIGGERS privacy and her peace. WRIGHT aka ALDERETE re-appeared in El Paso as a court coordinator in BIGGERS family law case. WRIGHT aka ALDERETE attempted to sabotage BIGGERS court proceedings by making false entries into the case docket and refusing to set hearings. ALFREDO ALDERETE colluded when he participated in multiple unlawful evictions against BIGGERS, stalked BIGGERS on behalf of the criminal enterprise. ALDERETE was aware of and assisted in the kidnapping of BIGGERS and her children. ALDERETE also committed fraud upon the court, tampered with the court docket entries, and falsified docket entries in attempt to sabotage BIGGERS family court case so that M.F. would be kidnapped.
986. JUDGE JESUS RODRIGUEZ was BIGGERS roommate in college. Judge RODRIGUEZ also subsequently stalked BIGGERS to Van Nuys California , slithered into her home and became her third roommate without her permission. The next time BIGGERS saw RODRIGUEZ, he followed BIGGERS to El Paso Texas and was now the presiding over BIGGERS child custody case. Just like Judges LAURA TAYLOR SWAIN, BARILL, RODRIGUEZ and REYES, he had full knowledge that BIGGERS was his roommate in college as well as his roommate in Van Nuys , California. RODRIGUEZ took these collusive actions to suppress evidence, silence BIGGERS, falsely imprison her, and assist in the concealment and the kidnapping of her children. In 2021 RODRIGUEZ signed an Order affirming that BIGGERS children were kidnapped and then instructed law enforcement including the EL PASO POLICE DEPARTMENT and the NYPD not to enforce the Order.
987. Judge JESUS URENDA conspired to deprive BIGGERS of her property and due process of law when he issued an illegal writ of possession against BIGGERS after BIGGERS won the eviction lawsuit in his

court. Judge URENDA then falsely arrested an imprisoned BIGGERS after unlawfully dispossessing her of her home with an illegal Writ of Possession.

988. Attorney OUISA DAVIS colluded with the criminal enterprise when she allowed BIGGERS to hire her as a privately retained divorce attorney with full knowledge that there was a preexisting conflict of interest. DAVIS took these actions to conceal crimes committed by the criminal enterprise that included rape, and to assist in the kidnapping of BIGGERS children. DAVIS also took steps in her unethical representation of BIGGERS to have her arrested and instructed URENDA to unlawfully dispossess BIGGERS of her home. DAVIS agreed to represent BIGGERS to take actions to her detriment, to interfere with her civil rights, and to cause BIGGERS and her children irreparable harm.
989. Attorney RICHARD BRUCE THARPE colluded with the criminal enterprise when he allowed BIGGERS to hire her as a privately retained divorce attorney with full knowledge that there was a preexisting conflict of interest. THARPE took these action to conceal crimes committed by the criminal enterprise that included rape, and to assist in the kidnapping of BIGGERS and her children. THARPE. And assisted in the unlawful dispossession of BIGEGRS home. Likewise, THARPE extorted \$20,000 from BIGGERS. THARPE used the money BIGGERS gave him to target her and hid in the El Paso County Court house garage while he forced BIGGERS to represent herself in the divorce case against SIMS. THARPE orchestrated the attempted murder of BIGGERS by the EL PASO COUNTY SHERIFF while she was his client. THARPE also retaliated against BIGGERS for not having any sexual interest in him whatsoever by filing perjury filled motions into her divorce case.
990. Attorney TROY BROWN aka SCOTT REID was BIGGERS former roommate in Tampa Florida. BROWN aka REID offered private representation of the Plaintiffs with no intention of providing them legal services. BROWN aka REID agreed to represent the Plaintiffs with the intent of only taking actions to their detriment and causing them irreparable harm. BROWN aka REID worked in tandem with the NYPD, YAHARA GUTIERREZ, THERESA CABALLERO, and the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE to kidnap the plaintiffs and falsely imprison BIGGERS. BROWN aka REID was privately retained to represent BIGGERS in her family law case against SIMS. He extorted two payments of \$10,000 from her with no intent of assisting her in family Court. BROWN aka REID intentionally failed to show up to Court Proceedings, and like RICHARD BRUCE THARPE, made BIGGERS act as her own attorney while he was privately retained. BROWN aka REID filed an appeal in BIGGERS case without her knowledge or consent. BROWN aka REID took these actions to prolong the reunification of BIGGERS and her children long enough for them to be kidnapped and irreparably harmed. While retained as her private attorneys, BROWN aka REID and CABALLERO broke attorney client privilege and devised a scheme to falsely arrest BIGGERS and to kidnap her children.
991. The Plaintiffs presented the military crimes and the conspiracy to interfere with their civil right to former United States Congressman ROBERT FRANCIS O'ROURKE and his assistant BENITO TORRES . O' ROURKE and TORRES had the Plaintiffs detail all of the crimes and conspiracies being committed against them in the form of multiple formal congressional inquiries. O'ROURKE and TORRES found that crimes, fraud, and corruption were occurring at Fort Bliss and Randolph Airforce base. After O'ROURKE and TORRES made these findings, they informed the Plaintiffs that they had spoken to KURT ANGLE and decided to destroy all of the records of the crimes. THE UNITED STATES OFFICE OF CONGRESS via BENITO TORRES and O'ROURKE hacked into BIGGERS email accounts that she had been corresponding with them on, changed all of her passwords , and began destroying all of the evidence of their crimes. THE UNITED STATES OFFICE OF CONGRESS through O'ROURKE showed a willful and deliberate indifference to the fact that crimes were being committed on their watch against the Plaintiffs, and that the Plaintiffs were being targeted by the UNITED STATES ARMY for reporting rape and abuse. CONGRESSWOMAN VERONICA ESCOBAR and O'ROURKE ordered the destruction of all of the evidence the plaintiffs presented and the evidence that had been uncovered. Instead of stepping in and helping the Plaintiffs, TORRES, O'ROURKE and ESCOBAR swept all of the crimes under the rug and told BIGGERS to "get a lawyer". While ANGLE, SIMS, and FULTON

were violating Orders of protection and stalking the Plaintiffs across the county; TORRES informed BIGGERS that he would be helping them to capture her.

992. JABARI MCINTYRE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. JABARI and CHRIS are responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JABARI participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. JABARI was aware of and participated in the attempted murders of the Plaintiffs. Additionally, JABARI colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. JABARI and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce as a whole. These actions were taken for the advancement of their criminal enterprise.
993. TODD KRESS colluded and conspired to stop BIGGERS from receiving her college education and to blackball her from college volleyball. As BIGGERS volleyball coach at FLORIDA STATE UNIVERSITY, Kress broke into BIGGERS hotel room in the middle of the night and doused her with ice buckets full of water while she slept. KRESS signed men to take playing time from BIGGERS and incited her teammates to create a hostile environment for her.
994. LARRY SAMPLE colluded and conspired to blackball BIGGERS from high school and college volleyball. SAMPLE recruited and allowed men to dress as women and take BIGGERS playing time.
995. BEN STROUD colluded and conspired to blackball BIGGERS from volleyball . STROUD recruited men dressed as women to take playing time from BIGGERS on the women's volleyball team. BEN was aware of and concealed the fact that BIGGERS was being drugged and raped in her sleep at the COLLEGE OF SOUTHERN IDAHO on his watch.
996. SUE SINCLAIR assisted in the kidnapping of BIGGERS children, concealed the kidnapping of the kidnapped children from BIGGERS, conceal that BIGGERS had been kidnapped, failed to report the kidnappings to law enforcement, and attempted to blackball BIGGERS from college volleyball.
997. SINCLAIR together with SANDRA LAWRENCE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. SANDRA and SUE are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. SANDRA and SUE participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. SANDRA and SUE were aware of and participated in the attempted murders of the Plaintiffs. Additionally, SANDRA and SUE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. SANDRA, SUE, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
998. THE COLLEGE OF SOUTHERN IDAHO colluded and conspired when they assisted in and covered up the rape ,drugging, and sex trafficking of BIGGERS in the female dorms.
999. FLORIDA STATE UNIVERSITY is responsible for the collusion and conspiracy of their faculty and staff as they acted to deprive BIGGERS of her volleyball scholarship and her college education. FLORIDA STATE UNIVERSITY colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked.
1000. UNIVERSITY OF TEXAS AUSTIN is responsible for the collusion and conspiracy of their faculty and staff to deprive BIGGERS of her college education and blackball her from women's basketball. The UNIVERSITY OF TEXAS AUSTIN hired co-conspirator JARRENCE HOWARD who had raped, molested,

stalked, and sex trafficked the Plaintiffs. THE UNIVERSITY OF TEXAS AUSTIN recruited and produced multiple attorneys to target the Plaintiffs and deprive them of their civil rights.

1001. EDWARD T MCGEE spearheaded the conspiracy to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked in Champaign Illinois. EDWARD T. MCGEE and Thomas Dexter Jakes are responsible for the childhood rape and sex trafficking of BIGGERS and her children. At all times JAKES and MCGEE were aware that children were being drugged, raped , and sex trafficked though their church.
1002. MCGEE and TD JAKES facilitated the kidnapping of BIGGERS and her children , and likewise did kidnap BIGGERS children. MCGEE is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MCGEE participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. MCGEE was aware of and participated in the attempted murders of the Plaintiffs. Additionally, MCGEE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. MCGEE and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1003. PAULA WHITE-CAIN was aware of and intentionally failed to report the rape , human trafficking, kidnapping, and child molestation BIGGERS and her children were subjected to. PAULA WHITE CAIN stalked , harassed, sabotaged, and tortiously interfered with BIGGERS employment, her employment contracts and her personal relationships. PAULA WHITE-CAIN orchestrated the kidnapping and attempted murder of BIGGERS in Lagos, Nigeria. PAULA WHITE CAIN, WITHOUT WALLS, and NEW DESTINY CHRITIAN CENTER kidnapped and trafficked the Plaintiffs children. WHITE-CAIN committed grand larceny , as well as coordinated and assisted in the grand larceny of BIGGERS home. WHITE-CAIN impersonated a Judge in El Paso, Texas in attempt to kidnap the Plaintiffs children and falsely imprison her.
1004. THE UNIVERSITY OF SOUTH FLORIDA colluded and conspired to deprive BIGGERS of access to a college education, refusing to allow her to attend classes that she had already paid for.
1005. KIA STEVENS kidnapped the Plaintiffs children. KIA impersonated a military doctor and kidnapped BIGGERS children by ripping them from her womb. KIA colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked.
1006. PAUL IRONS and OMAR BENSON MILLER colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. PAUL and OMAR are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. PAUL and OMAR participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. PAUL and OMAR was aware of and participated in the attempted murders of the Plaintiffs. Additionally, PAUL and OMAR colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. PAUL, OMAR, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1007. EL PASO INDEPENDENT SCHOOL DISTRICT colluded and conspired kidnap and assisted in the kidnapping of BIGGERS children. EPISD violated domestic violence protective orders , criminal no contact orders, and custody orders to assist the criminal enterprise in stalking BIGGERS and her children.

1008. CHICAGO PUBLIC SCHOOLS colluded and conspired to assist in the kidnapping of BIGGERS children. CHICAGO PUBLIC SCHOOLS via PARKER ELEMENTARY SCHOOL kidnapped M.F. from BIGGERS. CHICAGO PUBLIC SCHOOLS violated domestic violence protective orders , criminal no contact orders, and custody orders to assist the criminal enterprise in stalking BIGGERS and her children.
1009. NEW YORK ACS colluded and conspired kidnap and assisted in the kidnapping of BIGGERS children. EPISD violated domestic violence protective orders , criminal no contact orders, and custody orders to assist the criminal enterprise in stalking BIGGERS and her children.
1010. TEXAS CHILD PROTECTIVE SERVICES kidnapped and assisted in the kidnapping of BIGGERS children. TEXAS CHILD PROTECTIVE SERVICES violated domestic violence protective orders , criminal no contact orders, and custody orders to assist the criminal enterprise in stalking BIGGERS and her children.
1011. THE ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES kidnapped and assisted in the kidnapping of BIGGERS children. THE ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES violated domestic violence protective orders , criminal no contact orders, and custody orders to assist the criminal enterprise in stalking BIGGERS and her children
1012. THE STATE OF TEXAS colluded and conspired with the criminal enterprise as they kidnapped BIGGERS and assisted in the kidnapping of BIGGERS children. THE STATE OF TEXAS violated domestic violence protective orders , criminal no contact orders, and custody orders to assist the criminal enterprise in stalking BIGGERS and her children. THE STATE OF TEXAS conspired with the criminal enterprise when they fabricated a felony indictment and pursued a non-existent arrest warrant for BIGGERS arrest.
1013. THE STATE OF NEW YORK colluded and conspired with the criminal enterprise when they facilitated the kidnapping of BIGGERS , M.F., and Z.S. by the NYPD and NEW YORK ACS. THE STATE OF NEW YORK further colluded and conspired with the criminal enterprise when they intentionally and knowingly failed to intervene in the kidnapping of BIGGERS children while holding Court Orders that affirmed the children's kidnappings. THE STATE OF NEW YORK also falsely imprisoned BIGGERS without her ever being formally charged with any crime.
1014. THE STATE OF ILLINOIS colluded and conspired with the criminal enterprise when they supported and rewarded the kidnappers of BIGGERS children. THE STATE OF ILLINOIS further colluded and conspired with the criminal enterprise when they intentionally and knowingly failed to intervene in the kidnapping of BIGGERS children while holding Court Orders that affirmed the children's kidnappings. THE STATE OF ILLINOIS violated domestic violence protective orders, custody orders, and criminal no contact orders for the advancement of the criminal enterprise.
1015. THE CITY OF CHICAGO and LORI LIGHTFOOT colluded and conspired to have BIGGERS children's kidnapped. After it became obvious through court orders that M.F. was kidnapped, LORI LIGHTFOOT gave an unlawful order the all CHICAGO POLICE DEPARTMENTS to ignore BIGGERS custody and protective Orders for her child, and to conceal the kidnapped child's location from BIGGERS. LIGHTFOOT colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. LIGHTFOOT is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LIGHTFOOT participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. LIGHTFOOT was aware of and participated in the attempted murders of the Plaintiffs. Additionally, LIGHTFOOT colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. LIGHTFOOT and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1016. THE CITY OF NEW YORK, BILL DEBLASIO, and ERIC ADAMS colluded and conspired with the criminal enterprise when they instructed the NYPD to turn a blind eye to the kidnapping of BIGGERS children from NEW YORK and to ignore BIGGERS protective orders and custody orders.
1017. ERIC ADAMS and BILL DEBLASSIO gave unlawful Orders to law enforcement to violate the Plaintiffs civil rights, to not enforce any Court orders on their behalf, and to assist and allow crimes to be committed against the Plaintiffs.
1018. THE HAMLET OF SHIRLEY colluded and conspired with the criminal enterprise when the SHIRLEY NEW YORK POLICE entered into BRIGHTER TOMORROWS Domestic violence shelter and kidnapped BIGGERS,M.F., and Z.S.. To this day they have refused to take any action to correct their error.
1019. THE CITY OF BROOKHAVEN colluded and conspired with the criminal enterprise when the SHIRLEY NEW YORK POLICE entered into BRIGHTER TOMORROWS Domestic violence shelter and kidnapped BIGGERS,M.F., and Z.S.. They refused to take any action to correct their error.
1020. THE CITY OF EL PASO colluded and conspired with the criminal enterprise when they refused to arrest SIMS for violating the terms of his criminal no contact order, encouraged and allowed ANGLE and SIMS to file false police reports against BIGGERS. The CITY OF EL PASO also unlawfully disposed the Plaintiffs of their real and personal property as they burglarized the Plaintiffs home.
1021. THE CITY OF EL PASO and MAYOR DEE MARGO colluded and conspired to advance the criminal enterprise by ordering law enforcement to not intervene in crimes committed against the Plaintiffs. Operating under MAYOR DEE MARGO, the EL PASO POLICE DEPARTMENT did not respond to BIGGERS 911 calls, refused to take police reports of crimes committed against BIGGERS and her children. Furthermore, they allowed ANGLE and SIMS to burglarize, physically assault, and stalk BIGGERS, M.F. , and Z.S..
1022. THE SHIRLEY NEW YORK POLICE DEPARTMENT colluded and conspired with the criminal enterprise when the SHIRLEY NEW YORK POLICE entered into BRIGHTER TOMORROWS Domestic violence shelter and kidnapped BIGGERS,M.F., and Z.S.THE SHIRLEY NEW YORK POLICE DEPARTMENT, SHIRLEY PD OFFICER 1 and SHIRLLEY PD OFFIICER 2 along with the NEW YORK FUGITIVE SQUAD intentionally and knowingly kidnapped BIGGERS when they violated BIGGERS protective orders and custody orders. They intentionally falsely arrested BIGGERS without a warrant and without probable cause.
1023. THE EL PASO POLICE DEPARTMENT the EL PASO POLICE DEPARTMENT did not respond to BIGGERS 911 calls, refused to take police reports of crimes committed against BIGGERS and her children. Furthermore, they allowed ANGLE and SIMS to burglarize, physically assault, and stalk BIGGERS, M.F. , and Z.S..
1024. DETECTIVE ANTHONY CORONA and DETECTIVE CHARLES VERA colluded and conspired as they assisted in the false arrest and imprisonment of BIGGERS. CORONA and VERA assisted in the kidnapping and unlawful concealment of M.F. and Z.S. to advance the criminal enterprise. DETECTIVE VERA violated the criminal no contact orders in place against SIMS when he made third party contact with BIGGERS on SIMS behalf. VERA stalked, monitored, and harassed BIGGERS on behalf of ANGLE and SIMS to collude with them and to advance the criminal enterprise.VERA and CORNA are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. VERA and CORONA participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. VERA and CORONA were aware of and participated in the attempted murders of the Plaintiffs. VERA and CORONA conspired to falsely imprison the Plaintiff and to assist other law enforcement agents in completing the conspiracy.
1025. RICHARD WILES colluded and conspired to advance the criminal enterprise when he ordered his sheriff's deputies to not enforce BIGGERS orders of protection and also allowed SIMS to violate the Order. WILES also allowed SIMS to violate his criminal -no contact orders put in place to protect BIGGERS, Z.S. and M.F. When BIGGERS was released from being falsely imprisoned, WILES ordered

his deputies to handcuff BIGGERS again. BIGGERS was the listed victim in his office and had an active file with a Sheriff's victim's advocate. WILES treated SIMS as the victim and BIGGERS as the offender.

1026. Furthermore, WILES turned the EL PASO COUNTY SHERIFFS office into a grungy and corrupt street gang to target BIGGERS and assist in the kidnapping of her and her children. THE EL PASO COUNTY SHERIFFS office did collude and conspire to commit crimes against BIGGERS when they stalked her to her private residence, preformed an illegal traffic stop, put a gun to BIGGERS head, and attempted to murder her in front of her children. The best explanation the EL PASO COUNTY SHERIFF had when asked why they pulled BIGGERS over and held her at gunpoint was that BIGGERS had " improperly used lanes". Next WILES and THE EL PASO COUNTY SHERIFF'S issued a fictional warrant to arrest BIGGERS for possession of marijuana. The EL PASO COUNTY SHERIFF extorted another \$500 from BIGGERS. WILES targeted BIGGERS to advance ANGLE'S criminal enterprise.
1027. THE CITY OF HORIZON CITY is responsible for the actions of WILES and the EL PASO COUNTY SHERIFFS OFFICE detailed in the paragraphs above. They are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. They also participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children.
1028. Additionally, the above named participated in the attempted murders of the Plaintiffs
1029. BOTH NICOLE GARCIA and BRE GARCIA tortuously interfered with and committed the theft of BIGGERS employment contracts and her pending contracts. THE E! CHANNEL colluded and conspired with the criminal enterprise working to target BIGGERS when they allowed the tortious interference of BIGGERS contracts.
1030. MIKE BUCCI was aware of and concealed the attempted murder of BIGGERS at WWE'S DEEP SOUTH WRESTLING. He then appeared on WWE television programming in a position that belonged to BIGGERS.
1031. MIKE MIZANIN participated in and concealed the attempted murder of BIGGERS at WWE'S Deep South Wrestling. MIZANIN witnessed the attempted murder of BIGGERS at WWE'S DEEP SOUTH WRESTLING camp and claimed that he "didn't see anything or witness BIGGERS being abused". MIZANIN also fraudulently impersonated WWE officials to deceive BIGGERS, tortiously interfere with her WWE contract, and terrorize BIGGERS for the advancement of the criminal enterprise.
1032. LAUREN WILLIAMS colluded and conspired to blackball BIGGERS from the pro wrestling industry by supporting, participating in , and concealing the actions of the criminal enterprise. LAUREN WILLIAMS witnessed the attempted murder of BIGGERS by MIKE KNOX and BILL DEMOTT yet claimed she "didn't see anything, nor did he ever see BIGGERS be abused".LAUREN colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked.
1033. MIKE KNOX colluded and conspired to advancement the criminal enterprise when he attempted to murder BIGGERS in the ring by breaking her neck.
1034. ASHLEY GRUBB colluded and conspired with the criminal enterprise when participated in and supported the actions of attempting to murder BIGGERS by poisoning and the kidnapping of BIGGERS children.
1035. ALBERTA AMOATEG and STEPHANIE LAW colluded and conspired with the criminal enterprise when they participated in and supported the actions of attempting to murder the Plaintiffs by poisoning. AMOATEG and STEPHANIE also threatened the life of BIGGERS and her unborn children by attempting to entice BIGGERS to physical fight her while 5 months pregnant.
1036. RAQUEL TOLMARIE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. RAQUEL is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. RAQUEL participated in the conspiracy to rape , molest, falsely

imprison, and sex traffic the Plaintiff and her children. RAQUEL was aware of and participated in the attempted murders of the Plaintiffs. Additionally, RAQUEL colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. RAQUEL and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1037. DIEDRA COBB colluded and conspired to kill BIGGERS, M.F. and Z.S. by poisoning them. COBB stalked and terrorized the plaintiffs to advance the criminal enterprise. COBB plotted, planned and executed the kidnapping of BIGGERS children.
1038. DIEDRA HUETT colluded and conspired with the criminal enterprise when she stalked and monitored BIGGERS on behalf of JOHN HUETT, concealed the kidnappings of BIGGERS children, participated in the kidnapping of BIGGERS children.
1039. JODI REBER kidnapped BIGGERS children, concealed and supported the actions of others who had kidnapped BIGGERS children, monitored, and stalked BIGGERS.
1040. JODY HAMILTON colluded and conspired to black ball BIGGERS from professional wrestling while presiding over WWE'S DEEP SOUTH WRESTLING. HAMILTON facilitated and orchestrated for BIGGERS Deep South Co-Workers and trainers to turn into a street mob against BIGGERS. HAMILTON along with ANGLE and WILLIAM "BILL" DEMOTT arranged for BIGGERS to be murdered in the ring by MIKE KNOX. Although BIGGERS was signed WWE talent HAMILTON refused to allow BIGGERS to wrestle or participate in any manner on show. Instead, HAMILTON and DEMOTT found people off the streets to wrestle in BIGGERS place. HAMILTON , ANGLE, and DEMOTT also instructed BIGGERS coworkers to lie to the WWE office after BIGGERS reported being abused for the advancement of their criminal enterprise.
1041. TERRY TAYLOR colluded and conspired with the criminal enterprise when he concealed the attempted murder of BIGGERS by having her neck broken and by poisoning. TAYLOR was aware of sexual violence and workplace discrimination and violence being inflicted on BIGGERS by other employees and concealed these actions from authorities. Not only did TAYLOR conceal the crimes, he fired BIGGERS from Impact Wrestling in retaliation for her pursuing a protective order against ANGLE. TAYLOR intimidated BIGGERS on behalf of ANGLE when he instructed BIGGERS to not attend the Criminal proceedings against ANGLE in which BIGGERS was the victim.
1042. HEATH WALLACE MILLER colluded and conspired to advance the criminal enterprise when he poisoned BIGGERS with a substance that caused tumors to grow in her womb and another substance that melted BIGGERS skin from her body leaving her permanently disfigured. HEATH stalked, harassed and vandalized BIGGERS and her homes. HEATH assisted in the terrorism of BIGGERS through multiple unlawful dispossessions of her home and the theft of BIGGERS electronic devices. HEATH assisted in and coordinated the attempted murder of BIGGERS by vehicular homicide. HEATH intercepted BIGGERS mail and stole her paychecks. HEATH was aware that ANGLE was stealing BIGGERS mail and her paychecks and benefited from the stolen funds. HEATH WALLACE MILLER coordinated the attempted murder of BIGGERS by vehicular homicide. HEATH posed as BIGGERS boyfriend with the goal of murdering her. HEATH stole BIGGERS electronic devices multiple times. HEATH stalked and terrorized BIGGERS from Tampa Florida, to El paso Texas, to New York City. When BIGGERS was fleeing domestic violence, HEATH followed BIGGERS to Houston Texas. HEATH sabotaged BIGGERS employment and housing opportunities. When HEATH thought that BIGGERS was pregnant, he took a broomstick and swung it at BIGGERS abdomen with brutal force with the intent to murder. HEATH cut BIGGERS open while she was unconscious and kidnapped her children from her womb. HEATH impersonated a Judge and an attorney and wrote fraudulent Court orders to interfere with the Plaintiffs civil rights. HEATH has been in possession of BIGGERS kidnapped children.
1043. HEATH colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. HEATH is responsible

for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. HEATH participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. HEATH was aware of and participated in the attempted murders of the Plaintiffs. Additionally, HEATH colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. HEATH and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1044. HEATH then sent SAMANTHA ROBISON to carry on his dirty deeds against BIGGERS in El Paso,Tx from 2019-2021. ROBINSON stalked, harassed, and monitored BIGGERS as he colluded and conspired to advance the criminal enterprise. ROBINSON attempted to murder BIGGERS by poisoning her and was trespassed off of BIGGERS property as she attempted to steal BIGGERS dog.
1045. MECHELLE BAILEY MOORE colluded and conspired with the criminal enterprise when she kidnapped and assisted in the kidnapping of BIGGERS children. BAILEY slandered BIGGERS, stalked BIGGERS , stole BIGGERS property and stole BIGGERS identity.
1046. BAILEY participated in and concealed the attempted murder of BIGGERS and her children by poisoning them and by vehicular homicide.
1047. MICHELLE LYNCH ordered the attempted murder of BIGGERS while she was employed at WWE and IMPACT Wrestling. LYNCH attempted to murder BIGGERS in New York City in 2022. LYNCH colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. LYNCH is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LYNCH participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. LYNCH was aware of and participated in the attempted murders of the Plaintiffs. Additionally, LYNCH colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. LYNCH and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1048. CINDY FRELUND colluded and conspired with the criminal enterprise by her retaliatory firing of BIGGERS from CAMDEN PROPERTIES TRUST, concealing and assisting in the stalking of BIGGERS, concealing and assisting in the attempted murder of BIGGERS, and spearheading the blackballing of BIGGERS from the real estate industry.
1049. RANDY WHITE and HEATH WALLACE MILLER instructed the TAMPA POLICE DEPARTMENT to target BIGGERS. RANDY WHITE had BIGGERS skin burned off with a poisonous substance. RANDY WHITE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. RANDY WHITE is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. RANDY WHITE participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. RANDY WHITE was aware of and participated in the attempted murders of the Plaintiffs. Additionally, RANDY WHITE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. RANDY WHITE and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. WHITE is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the

kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. WHITE participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. WHITE was aware of and participated in the attempted murders of the Plaintiffs. WHITE used an unknown substance to burn the skin off of BIGGERS body with the assistance of HEATH MILLER. WHITE is responsible for the attempts to kill BIGGERS and her children through poisoning and vehicular homicide.

1050. DELEON RICHARDS SHEFFIELD colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. DELEON is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. DELEON participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. DELEON was aware of and participated in the attempted murders of the Plaintiffs. Additionally, DELEON colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. DELEON and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1051. TIM DELINA colluded and conspired with the criminal enterprise when he posed as a nurse in ILLINOIS and ripped BIGGERS children from her womb and kidnapped them after she had been raped. In addition to the 1999 kidnappings, DELINA continued to kidnap and assisted in the kidnappings of BIGGERS children in 2011 and 2016. DELINA stalked and monitored BIGGERS and her children that he had not successfully kidnapped. As recently as 2022, DELINA stood in the pulpit at TIMES SQUARE CHURCH and boasted that he had kidnapped BIGGERS children “like slaves on an auction block”
1052. DILENA is currently assisting in the unlawful concealment of BIGGERS kidnapped children in New York City. In addition to violently ripping BIGGERS children from her womb, DELINA went on to slander BIGGERS and claim that she murdered the children that he kidnapped. DELINA , on behalf of the criminal enterprise attempted to murder BIGGERS by poisoning and vehicular homicide. DELINA impersonated a Judge and assisted in the kidnapping and false imprisonment of BIGGERS by police as well attempted to blackball BIGGERS from the church.
1053. CARTER CONLIN assisted in the advancement of the criminal enterprise by publicly endorsing and supporting the behavior of TIM DELINA detailed in paragraphs above. TIMES SQUARE CHURCH is responsible for the actions of CONLIN and DELINA in the preceding paragraphs.
1054. JOEL OSTEEN, JOEL ELAM, and LAKEWOOD CHURCH colluded and conspired with the criminal enterprise when they sabotaged BIGGERS employment offers, made false accusations against BIGGERS, assisted in the kidnapping and concealment of BIGGERS children, and attempted to murder BIGGERS and her children by poisoning them.
1055. GEORGE MURDOCH and the FOX News Network knowingly and intentionally concealed violent crimes committed against BIGGERS and her children including rape and attempted murder.
1056. NATALIE KATHERINE NEIDHART colluded and conspired to kidnap BIGGERS children, kidnapped BIGGERS children, and concealed the kidnapping of BIGGERS children to advance the criminal enterprise. NEIDHART stalked and monitored BIGGERS on behalf of the enterprise. NEIDHART also worked to sabotage BIGGERS intimate and personal relationships. NEIDHART participated in the conspiracy to blackball BIGGERS from the professional wrestling industry. NEIDHART participated in the conspiracy to tortiously interfere with BIGGERS business contract with the WWE and the E! channel. NEIDHART participated in the conspiracy to murder BIGGERS through poisoning her , drowning, and through vehicular homicide.
1057. MONTY KIP SOPP colluded and participated in the conspiracy to blackball BIGGERS from professional wrestling. SOPP tortiously interfered with BIGGERS business contracts including at

Impact Wrestling and the WWE.SOPP supported, endorsed and instructed men to physically assault and murder BIGGERS for the advancement of the criminal enterprise.

1058. KATHY COLACE stalked and monitored BIGGERS in TAMPA and in NEW YORK CITY on behalf of the enterprise. She also worked to sabotage BIGGERS intimate and personal relationships. COLACE participated in the conspiracy to blackball BIGGERS from the professional wrestling industry. COLACE participated in the conspiracy to murder BIGGERS through poisoning her and through vehicular homicide. COLACE also tortiously interfered with BIGGERS business contracts including the contract BIGGERS earned with the E! channel and the WWE.
1059. GAIL KIM colluded and conspired to blackball BIGGERS from the professional wrestling industry by creating a hostile work environment and through slander. KIM went on to kidnap BIGGERS by posing as a Prison Transport Systems officer . KIM obstructed justice when she stole BIGGERS domestic violence protective order. KIM locked BIGGERS protective order under the prison transport van and then refused to give it back so that BIGGERS would be falsely imprisoned. KIM attempted to murder BIGGERS through poisoning, kidnapped BIGGERS children , and concealed the location of BIGGERS kidnapped children.
1060. JENNIPHER ADKINS did collude and conspire to advance the criminal enterprise by kidnapping BIGGERS newborn children from her womb. ADKINS then knowingly and intentionally lied to law enforcement and submitted false testimony to assist in the kidnapping of BIGGERS other children. ADKINS assisted in the attempts to murder BIGGERS and her children through poisoning them and through vehicular homicide.
1061. THE ASSOCIATE PRESS colluded and conspired to advance the criminal enterprise by knowingly and intentionally circulating erroneous and false outcomes of ANGLE'S criminal charges. THE ASSOCIATED PRESS took these actions to defame and discredit BIGGERS in their efforts to conceal and divert attention away from crimes of the criminal enterprise.
1062. E! Entertainment colluded and conspired to advance the criminal enterprise when they breached BIGGERS contract. After breaching BIGGERS contract the E! Channel allowed, rewarded, and supported the tortious interference with BIGGERS contract.
1063. TYLER PERRY and JEREMY BELL colluded and conspired with the criminal enterprise by tortious interference with BIGGERS business contracts, through kidnapping BIGGERS children, assisting in the kidnapping of BIGGERS children, and concealing the location of BIGGERS kidnapped children. PERRY aka BELL were also aware of and concealed the fact that BIGGERS and her children raped and sex trafficked and spread false rumors that BIGGERS was a biological male to conceal the kidnappings. PERRY and BELL defamed the Plaintiffs by declaring that they were biological males and addicted to drugs. BELL aka PERRY had full knowledge that the Plaintiffs are natural born females and that they had never been addicted to any drugs whatsoever.
1064. CORINTHIAN COLLEGES participated in the conspiracy by vandalizing BIGGERS vehicle, creating a hostile work environment, and unlawfully withholding BIGGERS salary.
1065. FACEBOOK violated BIGGERS 1st Amendment right of free speech. FACEBOOK muted BIGGERS social media pages, breached their terms of use, forced BIGGERS to submit a government issue ID to use her account, refused to verify her account, tampered with evidence by deleting BIGGERS accounts and by deleting the contents of her accounts.In further effort to silence BIGGERS, FACEBOOK refused to allow BIGGERS to pay for promotion of her posts after she released evidence of KURT ANGLE'S stalking and abuse.
1066. INSTAGRAM colluded and conspired to advance the criminal enterprise when they violated BIGGERS 1st Amendment right of free speech.
1067. INSTAGRAM muted BIGGERS social media pages, breached their terms of use, forced BIGGERS to submit a government issue ID to use her account, refused to verify her account, tampered with evidence by deleting BIGGERS accounts and by deleting the contents of her accounts

1068. ANITA LAWSON (THORNTON) colluded and conspired to advance the criminal enterprise when she concealed the fact tat JOHN HUETT raped and impregnated BIGGERS while BIGGERS was still a child. LAWSON was aware that BIGGERS would be raped multiple times after her childhood sexual molestation. LAWSON informed BIGGERS she would be raped and robbed long before her co-conspirators committed the rapes. After informing BIGGERS she would be raped again, LAWSON coordinated and assisted in the rape and molestation BIGGERS in her dorm room at Southern Idaho.LAWSON was aware of and participated in the attempts to murder BIGGERS and her children through vehicular homicide and through poisoning them.
1069. TROPICANA HOMES colluded and conspired with the criminal enterprise by wrongfully denying BIGGERS the ability to rent an apartment home.
1070. El Paso Collaborative, LORRIANE FRIAS, THERESA OF EL PASO COLLABORATIVE, DAN OLIVAS AND ASSOCIATES, PATTI OLIVAS, OUISA DAVIS,BRUCE THARPE, DAVID WOLKINSON,THE EL PASO COUNTY CONSTABLE, and JESUS URENDA took action to advance **ANGLE'S** criminal enterprise when they unlawfully disposed BIGGERS and her children of their home through Fraud upon the Court.
1071. PICASSO MICKENS kidnapped the Plaintiffs children. MICKENS colluded and conspired to advance the criminal enterprise when he stalked and monitored BIGGERS, kidnapped BIGGERS children, and concealed the kidnapping of BIGGERS other kidnapped children.
1072. EMPIRE BLUE CROSS and BLUE SHEILD, TEXAS BLUE CROSS and BLUE SHEILD, TRICARE, and CIGNA participated in the conspiracy of the criminal enterprise when their practitioners attempted to murder BIGGERS and her children by intentionally poisoning them and denying them medical care.
1073. MEDICAID and TRICARE participated in the criminal enterprise when their practitioners attempted to murder BIGGERS and her children by poisoning them and denying them medical care. Furthermore Medicaid assisted in and facilitated the kidnapping of BIGGERS children from the hospital.
1074. TAMPA GENERAL HOSPITAL colluded and conspired with the criminal enterprise by falsifying BIGGERS medical records, threatening to “cut BIGGERS in half down the middle and rip out her organs” and by their practitioners knowingly and intentionally falsely advising BIGGERS that she was not able to have children.
1075. CARLE HOPITAL, DR. JAMES SHEPHERD, FRANKLIN BROWN, and ALEXIS WILLIAMS colluded and conspired with the criminal enterprise when they orchestrated the kidnapping of BIGGERS children from her womb, falsified her medical records and violated her HIPPA rights.
1076. PROVIDENCE HOSPITAL colluded and conspired with the criminal enterprise when they allowed SIMS to physically assault BIGGERS in her hospital bed, violated BIGGERS HIPPA rights, falsified BIGGERS sonograms and medical records, and poisoned BIGGERS and her children through IV's while BIGGERS was pregnant.
1077. WILLIAM BEAUMONT ARMY MEDICAL CENTER colluded and conspired with the criminal enterprise when they falsified sonograms, falsified medical records, concealed the results of rape kits, premediated the kidnapping of BIGGERS and her children.
1078. WILLIAM BEAUMONT falsified BIGGERS sonograms and her medical records. WILLIAM BEAUMONT concealed the fact that BIGGERS was being raped while she was pregnant, concealed that BIGGERS had a multiple child pregnancy, then they gave BIGGERS newborn children away to kidnappers and rapists.
1079. Dr. QRUANA VEDDOY of WILLIAM BEAUMONT filmed and photographed the children she was kidnapping from BIGGERS womb as she committed the act.
1080. WILLIAM BEAUMONT then targeted BIGGERS on behalf of the criminal enterprise through their FAMILY ADVOCACY PROGRAM and CARREY CURRAN. WILLIAM BEAUMONT FAMILY ADVOCACY PROGRAM continued their efforts to harm BIGGERS by defaming her through corrupt and fraudulent

investigations, concealing that BIGGERS was repeatedly raped, and assisting the enterprise in stalking and terrorizing BIGGERS.

1081. CENTURY MEDICAL AND DENTAL colluded and conspired to advance the criminal enterprise when they attempted to murder BIGGERS by knowingly and intentionally injecting poison into her gums during a teeth cleaning, stealing parts of BIGGERS teeth, and refusing to provide medical care.
1082. BLUE LINE DENTAL and JORDAN PETRAS colluded and conspired to advance the criminal enterprise when PETRAS "treated" the infection BIGGERS got by attempting to flush and spread the infection. PETRAS then refused to prescribe antibiotics for the infection that he irritated.
1083. Prior to being her dentist in New York, PETRAS was working to advance the criminal enterprise in Tampa Florida as a property manager for MILESTONE MANAGEMENT.
1084. BIGGERS was a top performing sales consultant for MILESTONE, yet PETRAS wrongfully terminated BIGGERS.
1085. RAMIRO PANDO assisted KURT ANGLE in stalking, hunting and capturing the Plaintiffs in violation of multiple court orders.
1086. RICHARD MCDANIEL aka LARRY LAWRENCE kidnapped, stalked, raped, and sex trafficked the Plaintiffs. MCDANIEL colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. MCDANIEL is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MCDANIEL participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. MCDANIEL was aware of and participated in the attempted murders of the Plaintiffs. Additionally, MCDANIEL colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. MCDANIEL and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1087. DV Shelter Doe 1-25 breached the Plaintiffs confidentiality and assisted the criminal enterprise in stalking and kidnapping the Plaintiffs.
1088. Reality Of Wrestling , SHARMELL SULLIVAN HUFFMAN, and BOOKER T HUFFMAN colluded and conspired to blackball BIGGERS from professional wrestling and tortiously interfered with BIGGERS employment contracts. SHARMELL AND BOOKER T kidnapped BIGGERS children, assisted in the kidnapping of BIGGERS children, concealed the kidnappings of BIGGERS other children. To advance the criminal enterprise, SHARMELL AND BOOKER T withheld BIGGERS pay, attempted to frame BIGGERS for crimes, and interfered with her employment and housing in Houston. SHARMELL and BOOKER T acted in unison with BILL DEMOTT and AFA ANOAI blackballing BIGGERS from wrestling on their shows after hiring her to work there.
1089. AFA ANOAI JR. stalked , sabotaged, and defamed BIGGERS while working for the criminal enterprise. AFA ANOAI SR. extorted \$1,000 from BIGGERS promising to train her at WXW, then conspired with the criminal enterprise be never showing up to training sessions at his own school.
1090. GLEN FULTON colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS and her children. GLEN FULTON also was aware of the conspiracy to murder BIGGERS and her children, and attempted to murder BIGGERS and her children by poisoning them and by vehicular homicide. GLEN colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. GLEN is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. GLEN participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. GLEN was aware of and participated in the attempted murders of the Plaintiffs. Additionally, GLEN colluded with a vast network of co-

conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. GLEN and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1091. GLEN GILBERTTI colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. GILBERTTI is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. GILBERTTI participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. GILBERTTI was aware of and participated in the attempted murders of the Plaintiffs. Additionally, GILBERTTI colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. GILBERTTI and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1092. XAVIER FULTON and ALMA FULTON colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS and her children. XAVIER and ALMA were aware of the conspiracy to murder BIGGERS and her children, and attempted to murder BIGGERS and her children by poisoning them and by vehicular homicide.
1093. CODY WILSON and AMANDA FULTON kidnapped M.F. from and unlawfully concealed BIGGERS other kidnapped children in Chicago.
1094. FAITH ELAM and MELINDA ELAM colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. FAITH and MELINDA are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children
1095. LEROY EKECHUCKWU colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS and her children. EKECHUCKWU also was aware of the conspiracy to murder BIGGERS and her children, and attempted to murder BIGGERS and her children by poisoning them and by vehicular homicide. EKECHUCKWU, ASHLEY FULTON, and XAVIER FULTON participated in fictitious Court proceedings and sought to enforce fictional Court orders against the Plaintiffs in effort to kidnap and falsely imprison them. ASHLEY LONGPRE or ASHLEY FULTON colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS and her children. LONGPRE also was aware of the conspiracy to murder BIGGERS and her children, and attempted to murder BIGGERS and her children by poisoning them and by vehicular homicide.
1096. ASHLEY MEYER was BIGGERS volleyball teammate at Florida State University. ASHLEY MEYER colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS children. ASHLEY MEYER also was aware of the conspiracy to murder BIGGERS and her children, and attempted to murder BIGGERS and her children by poisoning them and by vehicular homicide. ASHLEY MEYER also colluded and conspired with the criminal enterprise when he attempted to steal BIGGERS identity and blackball BIGGERS from volleyball.
1097. ERIN LONGPRE and AMANDA SURRAT colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS and her children. LONGPRE and SURRAT also were aware of and participated in the conspiracy to kidnap and murder BIGGERS and her children by poisoning them and by vehicular homicide.
1098. AMANDA STELLING colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS' children. STELLING participated in the attempted murders of the Plaintiffs through vehicular homicide and poisoning. STELLING attempted to murder BIGGERS by poisoning her.

STELLING colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked

1099. University Doe 1-100 colluded and conspired with the criminal enterprise when they agreed to interfere with the Plaintiffs ability to obtain a degree from their learning institution.
1100. JOHNNIE COCHRAN raped the Plaintiffs and concealed the subsequent sexual assaults. COCHRAN attempted to conceal this children that resulted from the rapes by kidnapping them. COCHRAN orchestrated the conspiracy to interfere with the Plaintiffs civil rights and to murder them
1101. Corcoran Real Estate colluded and conspired with the criminal enterprise when they denied the plaintiffs rental property because they were paying with a HUD voucher.
1102. LIBERTY STAFFING participated in the conspiracy when they colluded to blackball the Plaintiff from the workforce, stalked her and assisted in the unlawful surveillance of the Plaintiffs on behalf of the criminal enterprise.
1103. THE BUCKLE participated in the conspiracy to falsely imprison her when they knowingly and intentionally attempted to frame the Plaintiff for retail theft with full knowledge that BIGGERS had never committed any crime.
1104. PAKASTAN INTERNATIONAL AIRLINE and the ROOSEVELT HOTEL partook in the conspiracy when they stalked the Plaintiffs on behalf of the criminal enterprise and retaliated against the Plaintiffs for reporting prostitution on their premises in 2019.
1105. LA FITNESS participated in the conspiracy when they colluded to deprive the Plaintiff's of employment, unlawfully withheld her pay, and assisted in the violation of protective orders as they stalked and monitored the Plaintiffs on behalf of the criminal enterprise.
1106. THE NEW YORK POST, THE ASSOCIATED PRESS, and MEDIA OUTLET DOE 1-100 participated in the conspiracy when they colluded with multiple other media outlets to falsely report that ANGLE was found "not guilty" in his criminal cases with the Plaintiff as the listed victim. The New York Post and MEDIA OUTLET DOE 1-100 had no evidence of a not guilty verdict .
1107. TMZ participated in the conspiracy to advance the criminal enterprise when they colluded to suppress the facts in the Plaintiffs case against ANGLE and the criminal enterprise.
1108. VH1 conspired with the criminal enterprise when they colluded with TV NETWORK doe 1-100 to blackball the Plaintiff from the television and entertainment industry.
1109. NYHCA conspired with the criminal enterprise in 2022 when they attempted to steer the plaintiffs , and unjustly denied the Plaintiffs access to housing.
1110. LORI APPLETON colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. LORI is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LORI participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. LORI was aware of and participated in the attempted murders of the Plaintiffs. Additionally, LORI colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. LORI and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1111. FELYSHA MONDRAGON , THE YWCA, THE YMCA, John Doe 1-10 and Jane Doe 1-10 colluded and conspired with the criminal enterprise as they assisted KURT ANGLE,EPHRAM SIMS, and XAVIER FULTON in kidnapping their victims. Posing as a domestic violence advocate, MONDRAGON assisted the criminal enterprise in stalking and kidnapping BIGGERS and her children. MONDRAGON facilitated and organized the kidnapping of BIGGERS and her children from BRIGHTER TOMORROWS domestic violence shelter in Shirley New York and NEW YORK CITY. In October of 2019 MONDRAGON

and these YWCA employees breached the Plaintiffs confidentiality, violated domestic violence protective orders that the Plaintiffs presented them with, stalked and monitored the Plaintiffs on behalf of the criminal enterprise. MONDRAGON and The YWCA intentionally created danger for the Plaintiffs by unjustifiably kicking them out of the Pueblo YWCA and sending them to Shirley New York for them to be kidnapped by the enterprise.

1112. DAVE HAWK colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked to conceal crimes committed by KURT ANGLE against BIGGERS.
1113. WESLEY COCHORAN stalked the plaintiff and assisted in the 2019 kidnappings of M.F.
1114. CIRCLE C RANCH discriminated against M.F. and BIGGERS by threatening to deny services without cause. Next, they assisted GLEN FULTON in stalking and hunting down M.F. and Z.S.
1115. KINDER CARE physically abused M.F. while she was enrolled in their facility. KINDER CARE dislocated M.F.'S arm in a violent attack against her. M.F. was two years old when she was physically assaulted by KINDER CARE on behalf of the criminal enterprise.
1116. ROSEMARY LAWRENCE, SANDRA LAWRENCE, SAVANNAH LAWRENCE, and STACEY LAWRENCE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. ROSEMARY, SANDRA, SAVANNAH, and STACEY are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ROSEMARY, SANDRA, SAVANNAH, and STACEY participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. ROSEMARY, SAVANNAH, STACEY and SANDRA were aware of and participated in the attempted murders of the Plaintiffs. Additionally, ROSEMARY, SANDRA, SAVANNAH, and STACEY colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. ROSEMARY, SANDRA, SAVANNAH, STACEY and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1117. Detective CORNELIUS STANLEY MUNGER, Detective DENISE DEMARCO, and Officer ANGELA ZANE of THE PITTSBURGH POLICE DEPARTMENT showed a willful and deliberate indifference towards crimes committed against BIGGERS, refused to take reports, and refused to intervene in the crime committed by KURT ANGLE against BIGGERS.
1118. BUBBA "THE LOVE SPONGE" CLEM published knowingly false and defamatory radio broadcast along with KURT ANGLE . CLEMS'S actions were taken to terrorize BIGGERS and to interfere with judicial proceedings.
1119. As BIGGERS volleyball coach, SUE SINCLAIR colluded and conspired to advance the criminal enterprise by stalking and kidnapping BIGGERS and her children. SUE SINCLAIR also was aware of the conspiracy to murder BIGGERS and her children, and attempted to murder BIGGERS and her children by poisoning them and by vehicular homicide. SINCLAIR at all times was aware that BIGGERS was sexually molested and that the babies were violently ripped from her womb while SINCLAIR was BIGGERS coach. When ILLINOIS CENTRAL COLLEGE volleyball practice began, BIGGERS was still bleeding from the violent assault on her womb. SINCLAIR along with SANDRA LAWRENCE concealed the rapes and kidnappings. SINCLAIR attempted to advance the criminal enterprise by having BIGGERS blackballed from college volleyball and basketball.
1120. TASHA VASQUEZ and COLLEGE CLUB APARTMENTS colluded and conspired to advance the criminal enterprise by unlawfully withholding BIGGERS pay for the work she preformed. TASHA VASQUEZ and COLLEGE CLUB APARTMENTS also assisted the criminal enterprise in stalking BIGGERS and unlawfully dispossessing her of her home.

1121. FLYING J colluded and conspired to advance the criminal enterprise when they poisoned BIGGERS and her children, accused BIGGERS of panhandling , and violently ripped merchandise for BIGGERS children's hands.
1122. HSN colluded and conspired to advance the criminal enterprise by wrongfully denying BIGGERS employment opportunities and discriminating against her based upon her race.
1123. PNC BANK colluded and conspired with the criminal enterprise when they allowed KURT ANGLE to deposit BIGGERS stolen paychecks into his account. PNC refused to correct the ongoing fraud when BIGGERS brought it to their attention and told BIGGERS that she " shouldn't have done what she did" in reporting ANGLES violent crimes to law enforcement.
1124. USAA colluded and conspired to advance the criminal enterprise by assisting them in stalking and the attempted murders of the Plaintiffs.
1125. CHASE BANK colluded and conspired to advance the criminal enterprise when they refused to cash BIGGERS LUCHA LIBRE USA paycheck that was issued from their own bank.
1126. STAN BERNSTEIN aka SHANE ONEAL and BMI MANAGEMENT colluded and conspired to advance the criminal enterprise when he drugged and raped BIGGERS while she was pregnant in Champaign Illinois. STAN assisted in and participated in the kidnapping and stalking of BIGGERS and her children, and pursued a retaliatory eviction against BIGGERS after withholding her pay.
1127. STAN stalked BIGGERS to EL PASO , dressed in drag, and posed as the EL PASO COUNTY DISTRICT ATTORNEY YVONNE ROSALES, and also posed as BIGGERS court appointed attorney SHANE ONEAL in the fictional criminal case without wearing his female disguise.
1128. 51st Street Owners Corp, SHELDON JACKLER, PING PENG JACKLER, and ABM MANAGEMENT conspired to advance the criminal enterprise by the actions of their shareholders, board members, and owners in strangling BIGGERS, stating that BIGGERS children were not allowed to move into the apartment, denying BIGGERS' valid forms of payment, and then pursuing a retaliatory eviction against BIGGERS.
1129. The UNIVERSITY OF SOUTH FLORIDA colluded and conspired to advance the criminal enterprise after refusing to allow BIGGERS to attend classes that she paid for and unjustly dropping BIGGERS from her classes at the start of the school term.
1130. MILESTONE MANAGEMENT is responsible for the actions taken by JORDAN PETRAS in the above paragraphs of this complaint. MILESTONE MANAGEENT terminated BIGGERS employment and unlawfully dispossessed her of her home in retaliation for reporting crimes committed against her by the criminal enterprise.
1131. GREYSTAR colluded and conspired with the criminal enterprise when they refused to rent an apartment to BIGGERS although she was their employee, and all employees automatically qualify for rentals. GREYSTAR management then pressured BIGGERS to drink alcohol while she was working in the leasing office. GREYSTAR created a hostile work environment for BIGGERS and intimidated her out of her job.
1132. KERRI COATS orchestrated BIGGERS being drugged and raped in her college dorm room while she was her roommate at the COLLEGE OF SOUTHERN IDAHO.
1133. ASHLEY HOLT orchestrated the theft of BIGGERS eggs, and organs. HOLT kidnapped BIGGERS children. HOLT orchestrated having BIGGERS drugged, raped, and sex trafficked while she was unconscious after cosmetic surgery.
1134. ERIKA BRYAN and FOX are responsible for assisting in the advancement of the criminal enterprise by assisting in and concealing the crimes FORT BLISS and the UNITED STATES ARMY committed against BIGGERS and her children. Through her actions and lack of actions BRYAN assisted in the rape, molestation, and kidnapping of BIGGERS and her children.
1135. NEW YORK ACS Worker 1 and NEW YORK ACS WORKER 2 colluded and conspired to advance the criminal enterprise as the facilitated the kidnapping of BIGGERS children from BRIGHTER

TOMORROWS domestic violence shelter, gave away “custody” of BIGGERS children without going before any Judge, and refused to correct their error. NEW YORK ACS WORKER 1 then facilitated the kidnapping of M.F. and Z.S. from New York City on October 10th 2019. They have refused to correct their error and claim they “ don’t have jurisdiction” over the children which they had kidnapped.

1136. Grand Central Kennedy and SCOTT REID aka TROY BROWN colluded and conspired to advance the criminal enterprise by spying on BIGGERS, stalking her, and unlawfully dispossessing BIGGERS of her home. SCOTT REID aka TROY BROWN has stalked the Plaintiffs from 2009 in Tampa , Florida up until present day as he has moved across the street from BIGGERS in New York City.
1137. The ROOSEVELT HOTEL colluded and conspired to advance the criminal enterprise by spying on and stalking BIGGERS and her children on behalf of ANGLE, SIMS , HUETT, and FULTON
1138. THE ROOSEVELT HOTEL retaliated against BIGGERS for reporting prostitution as well as blood soaked and stained bedding in her hotel room and for BIGGERS reporting prostitution by attempting to kick BIGGERS out of the hotel.
1139. UNIVERSITY OF ILLINOIS, DON HARDIN, and THERESA GRENTZ colluded and conspired to advance the criminal enterprise by attempting to blackball BIGGERS out of basketball and volleyball.
1140. GRENTZ and HARDIN were aware of and participated in the attempted murders of the Plaintiffs
1141. GRENTZ and HARDIN both worked to advance the conspiracy to deprive BIGGERS of her college education and to blackball her from basketball, volleyball, and deprive her of her college education.
1142. The UNIVERSITY of ILLINOIS is responsible for BIGGERS being raped and molested while she was a minor by JERRANCE HOWARD and their employees on campus.
1143. TB JOSHUA, PAULA WHITE, The SYNAGOGUE CHURCH OF ALL NATIONS, The NIGERIAN POLICE, and LAGOS STATE colluded and conspired to advance the criminal enterprise by withholding BIGGERS pay, having BIGGERS kidnapped and held for ransom, kidnapping BIGGERS children, and concealing the kidnapped children’s location.
1144. MCKENZIE CLOSEN conspired to advance the criminal enterprise by assisting HUETT, WILLIAMS, and ANGLE in stalking, sex trafficking, and attempting to murder BIGGERS as well as kidnapping BIGGERS and her children.
1145. Judge YAHAR LISA GUTIERREZ and her 65th JUDICIAL DISTRICT COURT are the spearheads of the terroristic criminal enterprises’ child trafficking ring in El Paso Texas. GUTIERREZ did collude and conspire to advance the criminal enterprise disguising herself as a “judge” . GUTIERREZ displayed audacious acts in abusing her power, abusing her discretion, kidnapping BIGGERS children across state lines from New York to El Paso, falsely arresting and falsely imprisoning BIGGERS. GUTIERREZ was aware of and participated in the attempted murders of the Plaintiffs. GUTIERREZ ordered the kidnapping of the Plaintiffs from New York City.
1146. KINGS TOWING colluded and conspired with the criminal enterprise when they committed grand theft auto of BIGGERS vehicles from her driveways.
1147. VICKI GURRERO colluded and conspired with the criminal enterprise when he orchestrated and participated in the kidnappings of BIGGERS and her children. He also colluded to blackball BIGGERS from the professional wrestling industry.
1148. ALEXA MODELS, BENZ MODELS, and LEVEL TALENT colluded and conspired with the criminal enterprise to blackball BIGGERS from the modeling industry.
1149. CARLOS BOOZER stalked BIGGERS at her basketball games while she was playing for SOUTHERN IDAHO on behalf of the criminal enterprise.
1150. U-HAUL colluded and conspired with the criminal enterprise through assisting with burglaries , grand larceny, kidnapping, and stalking of BIGGERS and her children.
1151. DAVE TAYLOR and WILLIAM REGAL concealed the attempted murder of BIGGERS at WWE’S Deep South Wrestling. TAYLOR and REGAL also sabotaged BIGGERS WWE career and worked to blackball her from professional wrestling.

1152. JODY HAMILTON colluded and conspired with the criminal enterprise by recruiting people to murder BIGGERS at WWE'S DEEP SOUTH WRESTLING. HAMILTON orchestrated the attempted murder of BIGGERS at DEEP SOUTH WRESTLING by MIKE KNOX. After orchestrating the attempted murder of BIGGERS, HAMILTON lied and stated that the attempted murder never happened. HAMILTON colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked.
1153. ALLEN FUNK knowingly and intentionally lied on BIGGERS when he falsely asserted that she was born a biological male. and attempted to murder her. FUNK colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. FUNK is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. FUNK participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. FUNK was aware of and participated in the attempted murders of the Plaintiffs. Additionally, FUNK colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. FUNK and the other co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise.
1154. STEVE SHIP, VERONICA SALINAS, MTV, and LUCHA LIBRE MASKED WARRIORS colluded and conspired with the criminal enterprise by falsely representing that BIGGERS was not a natural born woman, fired BIGGERS for getting pregnant, unlawfully withheld her pay, and then blackballed her from professional wrestling.
1155. UNITED STATES ARMY CAPTIAN ALEX BROWN colluded and conspired with the criminal enterprise when he refuse to uphold the ARMY values, concealed BIGGERS abuse and rape by his soldiers, conspired to and assisted in the kidnapping of BIGGERS children with the help of his wife ALEXA BASE and JESSICA BROWN.
1156. DEAN MALENKO colluded and conspired with the criminal enterprise by unlawfully gaining access to BIGGERS medical record through his wife who worked at the NEUROPSYCHIATRIC INSTITUTE of TAMPA , defamed BIGGERS, and blackballed her from wrestling in effort to get revenge on behalf of the criminal enterprise.
1157. CLINT DEAS colluded and conspired with the criminal enterprise when he assisted and participated in the drugging, rape, molestation and sex trafficking of BIGGERS at the COLLEGE OF SOUTHERN IDAHO. DEAS was aware of and participated in the kidnappings and attempted murders of BIGGERS and her children. DEAS re-appeared stalking BIGGERS in New York City in 2022.
1158. PAUL HEYMAN or "ECW PENCIL" conspired with the criminal enterprise by stealing BIGGERS original storylines and ideas that she wrote for herself in WWE, plagiarizing her original writings on WWE programming, attempting to blackball her from wrestling. HEYMAN participated and concealed the attempted murder of BIGGERS by MIKE KNOX. HEYMAN retaliated against BIGGERS for attempting to report abuse and sexual harassment she was suffering at WWE'S DEEP SOUTH WRESTLING.
1159. RICHARD HENRY BLOOD SR. aka "RICKY STEAMBOAT" and MARK CARRANO colluded and conspired with the criminal enterprise when they retaliated against BIGGERS for reporting the physical ,sexual, and psychological abuse she was suffering at the hands of BIILL DEMOTT and JODY HAMILTON. BLOOD and CARRANO punished BIGGERS for refusing to do voodoo and agreeing to wrestle barefoot by blackballing her from profession wrestling while she was actively signed to the WWE. BLOOD and CARRANO concealed the attempted murder of BIGGERS by MIKE KNOX at DEEP SOUTH WRESTLING.

1160. THE NEUROPSYCHIATRIC INSTITUTE OF TAMPA is responsible for colluding with the criminal enterprise because they violated BIGGERS HIPPA rights to assist MALENKO and his wife waife in disclosing BIGGERS private medical records to the criminal enterprise.
1161. GOLDS GYM colluded and conspired with the criminal enterprise by stalking, monitoring and unjustly firing BIGGERS from their Champaign Il Location. GOLD'S GYM ,JIM BURTOFT, and TONY PETRUZZI colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. BURTOFT and PETRUZZI are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. BURTOFT and PETRUZZI participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. BURTOFT and PETRUZZI were aware of and participated in the attempted murders of the Plaintiffs. Additionally, BURTOFT and PETRUZZI colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. BURTOFT , PETRUZZI, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1162. POWERHOUSE GYM colluded and conspired with the criminal enterprise by stalking and monitoring BIGGERS. POWERHOUSE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. POWERHOUSE is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. POWERHOUSE participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. POWERHOUSE was aware of and participated in the attempted murders of the Plaintiffs. Additionally, POWERHOUSE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. POWERHOUSE and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1163. WOW Wrestling colluded and conspired with the criminal enterprise by blackballing BIGGERS from wrestling.
1164. ALL ELITE WRESTLING, SHAD KHAN, TBS NETWORK and TONY KHAN all colluded with and conspired to blackball BIGGERS from professional wrestling and to falsely imprison her.
1165. ALL ELITE WRESTLING, SHAD KHAN, and the TBS Network are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ALL ELITE WRESTLING, SHAD KHAN, CODY RUNNELS, BRANDI RUNNELS, and the TBS NETWORK all intentionally participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children.
1166. ALL ELITE WRESTLING, SHAD KHAN, TONY KHAN,and the TBS NETWORK were also aware of and participated in the attempted murders of the Plaintiffs by poisoning them, and vehicular homicide.
1167. MMG Talent management colluded and conspired to blackball BIGGERS from modeling and the entertainment industry.
1168. THE NATIONAL WRESTLING ALLIANCE, BILLY COROGAN, and BRUCE THARPE colluded and conspired with the criminal enterprise to blackball BIGGERS from professional wrestling.
1169. CORGAN, THARPE , and the NWA are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. COROGAN, THARPE, and the NWA

participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. CORGAN, THARPE, and the NWA were aware of and participated in the attempted murders of the Plaintiffs

1170. The WORLD WRESTLING ENTERTAINMENT and STEPHANIE MCMAHON also violated their own domestic violence policy when they hired KURT ANGLE while he was actively violating a domestic violence protective order that BIGGERS had against him. The hiring of ANGLE by WWE while there was an active family violence protective order against him provided ANGLE with the financial and corporate support that made his kidnapping and rapes of BIGGERS and her children possible.
1171. SHANNON SPURILL attempted to murder BIGGERS on behalf of the enterprise by attempting intentionally to break her neck. SPURILL attempted to murder BIGGERS on behalf of MICHELLE LYNCH and KURT ANGLE.
1172. DEEP SOUTH WRESTLING, JOHN DOE 10-40 and JANE DOE 10-40 colluded and conspired with the criminal enterprise when they worked to black ball BIGGERS from professional wrestling and attempted to murder and sex traffic her. These Defendants witnessed the attempted murder of BIGGERS by MIKE KNOX, then proceeded to lie and claim that the attempted murder never occurred.
1173. CHAVO GURRERO colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. CHAVO is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. CHAVO participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. CHAVO was aware of and participated in the attempted murders of the Plaintiffs. Additionally, CHAVO colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. CHAVO and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1174. KRISTEN EUBANKS colluded and conspired with the criminal enterprise by intentionally kicking BIGGERS in her eye so hard that BIGGERS real eyelashes were ripped off, and concealing the attempted murder of BIGGERS by MIKE KNOX., and the workforce. These actions were taken for the advancement of their criminal enterprise
1175. ALEX ABRAHANTES colluded and conspired with the criminal enterprise by unlawfully withholding BIGGERS pay for her work at LLUSA. ABRAHANTES colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. ABRAHANTES is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ABRAHANTES participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. ABRAHANTES was aware of and participated in the attempted murders of the Plaintiffs. Additionally, ABRAHANTES colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. ABRAHANTES and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1176. MARK ROBERT JINDRAK colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. JINDRAK is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JINDRAK participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. JINDRAK was aware of and participated in the attempted murders of the Plaintiffs. Additionally, JINDRAK colluded with a vast network of co-

conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. JINDRAK and the co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1177. MARTY JANNETTY colluded and conspired with the criminal enterprise by participating in the kidnapping of BIGGERS and BIGGERS children, defaming BIGGERS, and concealing the sex trafficking of BIGGERS and her children. JANNETTY also defamed BIGGERS by accusing her of participating in grotesque sex acts while she was a minor and assisted in the blackballing of BIGGERS from professional wrestling. JANNETTY is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JANETTEY participated in the conspiracy to stalk, rape , molest, mutilate, and sex traffic BIGGERS and her children. JANNETTY was aware of and participated in the attempted murders of the Plaintiffs

1178. RANDY ORTON participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. ORTON was aware of and participated in the attempted murders of the Plaintiffs. ORTON created a hostile work environment for BIGGERS at the WWE in retaliation for BIGGERS not accepting his sexual advances and also assisted in the blackballing of BIGGERS from professional wrestling.

1179. JEFF JARRETT kidnapped BIGGERS children. JEFF colluded and conspired with the criminal enterprise by participating in the kidnapping of BIGGERS and BIGGERS children, defaming BIGGERS, and concealing the sex trafficking of BIGGERS and her children. JEFF JARRETT breached BIGGERS contract, fired her ,and withheld her pay in retaliation for reporting crimes committed by KURT ANGLE to law enforcement. BIGGERS was retaliated against for not complying with JARRETT'S demand that she have sex with SCOTT RECHSTEINER. JEFF JARRETT used IMPACT WRESTLING to assist ANGLE in raping and sex trafficking BIGGERS. JEFF was aware of and participated in the attempted murders of the Plaintiffs. JEFF created a hostile work environment for BIGGERS spearheaded the blackballing of BIGGERS from professional wrestling

1180. KAREN SMEDLY , also known as KAREN JARRETT participated in stealing BIGGERS identity, kidnapping BIGGERS children, and stealing BIGGERS paychecks. KAREN was aware of and participated in the attempted murders of the Plaintiffs. KAREN JARRETT placed hidden cameras in BIGGERS private residence, stalked her and monitored her without her knowledge or consent.

1181. SCOTT RECHSTEINER drastically altered his appearance and stalked BIGGERS to FLORIDA STATE UNIVERSITY to frame, sex traffic, and molest her prior to her being signed to IMPACT WRESTLING and the WWE. RECHSTEINER later created a hostile work environment for BIGGERS at IMPACT WRESTLING by pressuring her to have sex with him after television tapings, and defaming BIGGERS by falsely accusing her of participating in lewd sex acts. RECHSTEINER colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. RECHSTEINER is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. RECHSTEINER participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. RECHSTEINER was aware of and participated in the attempted murders of the Plaintiffs. Additionally, RECHSTEINER colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. RECHSTEINER and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1182. WILLIAM CHARLES DEMOTT aka BILL DEMOTT ordered and concealed the attempted murder of BIGGERS while she was at WWE'S DEEP SOUTH . He also attempted to murder BIGGERS and her children by vehicular homicide and poisoning them. BILL DEMOTT spearheaded the blackballing of

BIGGERS from professional wrestling through his tortious interference with BIGGERS' contracts. DEMOTT created a hostile work environment for BIGGERS, instructed all other talent to harass and sabotage BIGGERS, sexually harassed and physically assaulted BIGGERS while at DEEP SOUTH WRESTLING. DEMOTT asked BIGGERS "who did you f*** to get hired?" in front of her entire wrestling class. DEMOTT colluded to blackball BIGGERS from professional wrestling, tortiously interfered with BIGGERS WWE Contract and other business contracts. Although it was DEMOTT's job to prepare BIGGERS for live T.V., DEMOTT publicly declared that BIGGERS would make it onto television "over his dead body."

1183. THOMAS JAMES LAUGHLIN created and supported the hostile work environment for BIGGERS at the WWE and also assisted in the blackballing of BIGGERS from professional wrestling. LAUGHLIN orchestrated and concealed the attempted murder of BIGGERS at DEEP SOUTH WRESTLING.
1184. SAFE HORIZONS colluded and conspired with the criminal enterprise to assisting the stalking and kidnapping of BIGGERS and her children from New York City.
1185. INTEGRITY ASSET MANAGEMENT, DENIS, and TREVINO PLACE APARTMENTS participated in the conspiracy to unlawfully dispossess the Plaintiffs of their home.
1186. THE URBYS participated in the conspiracy to deny the Plaintiffs housing for the advancement of the criminal enterprise when they denied BIGGERS the right to move into an apartment that she applied for and was approved for. This act was a part of the collusive efforts of the criminal enterprise to deny BIGGERS access to a dwelling place.
1187. GIOVANNA YANOTTI was fired from the set of the Lionsgate film WARRIOR for harassing BIGGERS on set. YANOTTI stalked and monitored BIGGERS on behalf of ANGLE, then later kidnapped BIGGERS children.
1188. DIEDRA COBB and FRED COBB colluded and conspired with the criminal enterprise when they participated in the kidnapping of BIGGERS children on October 21st 2011 from Carle Hospital. COBB attempted to murder BIGGERS and her children by vehicular homicide and by poisoning them.
1189. SHELLY MARTINEZ posed as BIGGERS friend in effort to stalk, monitor, and falsely imprison her on behalf of KURT ANGLE.
1190. AFA ANOAI SR. breached his contract with BIGGERS at WXW by means of extortion, fraud, and theft.
1191. LETITIA JAMES colluded and conspired with the criminal enterprise when she willfully and intentionally ignored the constitutional violations of her law enforcement officers in the kidnappings of BIGGERS and her children. JAMES' willful and intentional indifference for the stalking and kidnappings of BIGGERS and her children render her liable for their actions.
1192. DIXIE CARTER, IMPACT WRESTLING, and PANDA ENERGY colluded and conspired with the criminal enterprise when they participated in the stalking, rape, sex trafficking, and kidnapping of BIGGERS and her children.
1193. CARTER retaliated against BIGGERS for reporting ANGLE's violent crimes to police by breaching her contract and firing her. CARTER conspired to steal BIGGERS real and intellectual property and also tortiously interfered with BIGGERS other business contracts.
1194. CARTER orchestrated the drugging, rape, and sex trafficking of BIGGERS at IMPACT WRESTLING.
1195. MICHAEL WILLIAMS, CHRISTOPHER CROSS, FORT BLISS, and THE DEPARTMENT OF DEFENSE colluded and conspired with the criminal enterprise when they participated in the stalking and kidnapping of BIGGERS and her children. CROSS and WILLIAMS participated in the attempted murders of BIGGERS and her children for the advancement of their terroristic criminal enterprise. CROSS and WILLIAMS colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. CROSS and WILLIAMS are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the

location of the kidnapped children. CROSS and WILLIAMS participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. CROSS and WILLIAMS were aware of and participated in the attempted murders of the Plaintiffs. Additionally, CROSS and WILLIAMS colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. CROSS, WILLIAMS, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1196. JIM ROSS colluded and conspired with the criminal enterprise when he intentionally and knowingly published defamatory statements about BIGGERS after she reported ANGLE'S abuse to the authorities.
1197. STERLING PROPERTIES participated in the criminal conspiracy to wrongfully evict BIGGERS, to rape her and to sex traffic BIGGERS as a minor.
1198. WYNDHAM HOTELS and the RAMADA participated in the conspiracy to enslave BIGGERS and wrongfully terminated her. WYNDHAM HOTELS and the RAMADA hired BIGGERS, made her work for them for an extended period of time, and then refused to pay her for her. WYNDHAM and the RAMADA also served as surveillance as they stalked and monitored BIGGERS on behalf of the criminal enterprise.
1199. HR Block stalked, monitored, and gathered information about BIGGERS and provided it to the criminal enterprise. HR BLOCK tampered with and destroyed files and documents BIGGERS provided them with and refused to complete BIGGERS tax returns for the advancement of the criminal enterprise.
1200. PNC Bank allowed KURT ANGLE to steal and deposit BIGGERS paychecks and refused to intervene in his criminal acts for the advancement of the criminal enterprise.
1201. SCOTT REID stalked, monitored and unlawfully dispossessed BIGGERS of her home in Tampa Florida for the advancement of the criminal enterprise. REID impersonated BIGGERS attorney and/or presented himself to be TROY BROWN to assist in kidnapping and falsely imprisoning the Plaintiffs.
1202. AVESTA colluded and conspired with the criminal enterprise to unlawfully disposes BIGGERS of her home, unlawfully withhold her pay, and disconnected BIGGERS utilities for the sole purpose of terrorizing her on behalf of KURT ANGLE and HEATH MILLER.
1203. THE UNITED STATES AIRFORCE , "USAF" concealed the violent crimes against the Plaintiffs on RANDOLPH AIRFORCE BASE.
1204. JACKSONVILLE SCHOOL DISTRICT 117, FRANKLIN ELEMENTARY SCHOOL, JACKSONVILLE HIGH SCHOOL, TURNER JR HIGH, CYNTHIA HURST, ED WAINSCOTT, and THE URBANA SCHOOL DISTRICT colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. HURST and WAINSCOTT were the Plaintiffs elementary school and high school principals. HURST and WAINSCOTT are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. HURST and WAINSCOTT participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. HURST and WAINSCOTT were aware of and participated in the attempted murders of the Plaintiffs. Additionally, HURST and WAINSCOTT colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. HURST, WAINSCOTT, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise.
1205. SAUL AMINDARIZ and THOMAS COE colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex

trafficked. SAUL and THOMAS are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. SAUL and THOMAS participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. SAUL and THOMAS were aware of and participated in the attempted murders of the Plaintiffs. Additionally, SAUL and THOMAS colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. SAUL, THOMAS, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1206. JOHN WILLIAM ROBINSON aka CAPTAIN BRIAN KELLY kidnapped BIGGERS children from her womb at WILLIAM BEAUMONT ARMY MEDICAL CENTER. ROBINSON impersonated law enforcement officers to terrorize and stalk BIGGERES. ROBINSON fraudulently enlisted into the ARMY to terrorize, kidnap and murder the Plaintiffs. ROBINSON worked as the hands and feet for HUETT, LAWRENCE and ANGLE. ROBINSON stalked BIGGERS in Tallahassee Florida, McDonough Georgia, Tampa Florida , and El Paso Texas that she is aware of . ROBINSON interfered with her civil rights in each city. ROBINSON is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ROBINSON was participated in the conspiracy to rape , molest, mutilate, and sex traffic BIGGERS and her children. ROBINSON was aware of and participated in the attempted murders of the Plaintiffs and colluded to blackball BIGGERS from .
1207. DAVE MELTZER colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. MELTZER and ANGLE are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MELTZER and ANGLE participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. MELTZER and ANGLE were aware of and participated in the attempted murders of the Plaintiffs. Additionally, MELTZER and ANGLE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. MELTZER, ANGLE, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1208. LACEY DEMOTT and STEVEN BORDEN orchestrated and concealed the attempted murder of BIGGERS by MIKE KNOX at WWE'S DEEP SOUTH. LACEY and BORDEN colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. LACEY and BORDEN are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LACEY and BORDEN participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. LACEY and BORDEN were aware of and participated in the attempted murders of the Plaintiffs. Additionally, LACEY and BORDEN colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. LACEY, BORDEN, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1209. STOCKBRIDGE HOLDINGS along with SHELDON JACKLER colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned.

1210. JOEL DALTON ELAM, or JOEL ELAM kidnapped BIGGERS children from her womb. JOEL stalked the Plaintiffs in New York City, Houston, and Tampa Florida that they are aware of. JOEL colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. JOEL is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JOEL participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. JOEL was aware of and participated in the attempted murders of the Plaintiffs. Additionally, JOEL colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. JOEL and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1211. JAMES PATRICK, a SGT. Major at FORT BLISS colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. JAMES is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JAMES participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. JAMES was aware of and participated in the attempted murders of the Plaintiffs. Additionally, JAMES colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. JAMES and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1212. ISAAC WRIGHT JR. and ISAAC COLLINS went to law school with the intent to use their legal education to participate in the conspiracy to deprive the Plaintiffs of their civil rights. WRIGHT sabotaged and interfered with BIGGERS close personal relationships through privacy invasions, stalking, assault, battery, and slander. WRIGHT stole the keys to BIGGERS apartment and unlawfully dispossessed her of her home in Florida and in New Mexico. WRIGHT participated in the conspiracy to rape, moles, physically assault, mutilate, kidnap and sex traffic the Plaintiffs. WRIGHT ordered and orchestrated the unlawful dispossession of multiple residences that the Plaintiffs occupied in hopes of rendering the Plaintiffs homeless and kidnapping BIGGERS children.
1213. THE OFFICE OF THE INSPECTOR GENERAL, FORT BLISS, THE DEPARTMENT OF DEFENSE, MIKE BARNES, THE UNITED STATES ARMY, THE ARMY CRIMINAL INVESTIGATION DIVISION, and the FORT BLISS MILITARY POLICE knowingly and intentionally failed to intervene in the stalking, rape ,and sex trafficking of the Plaintiffs. These Defendants knowingly and intentionally altered police reports made by BIGGERS and tampered with evidence in pending criminal investigations.
1214. THE OFFICE OF THE INSPECTOR GENERAL, FORT BLISS, THE DEPARTMENT OF DEFENSE, MICHAEL BARNES, THE UNITED STATES ARMY, THE ARMY CRIMINAL INVESTIGATION DIVISION, and the FORT BLISS MILITARY POLICE are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
1215. THE OFFICE OF THE INSPECTOR GENERAL, FORT BLISS, THE ARMY CRIMINAL INVESTIGATION DIVISION, THE DEPARTMENT OF DEFENSE, BARNES and FORT BLISS MILITARY POLICE participated in the conspiracy to rape, murder , molest, falsely imprison, and sex traffic BIGGERS and her children.
1216. BARNES, THE DEPARTMENT OF DEFENSE, THE UNITED STATES ARMY, THE ARMY CRIMINAL INVESTIGATION DIVISION, and the FORT BLISS MILITARY POLICE were aware of and participated in the attempted murders of the Plaintiffs.

1217. THE DEPARTMENT OF DEFENSE conspired with the criminal enterprise when they knowingly and intentionally allowed for JOHN ROBINSON, EPHRAM SIMS, and KURT ANGLE to fraudulently enlist in the ARMY so that they could rape, molest, sex traffic , and murder the Plaintiffs.
1218. FEDERAL BREAU of INVESTIGATIONS is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
1219. Not only did the FBI participate and conceal the sex crimes and kidnappings of the Plaintiffs, the also knowingly and intentionally failed to intervene. The FBI lied in their investigations, falsely accused BIGGERS of being indicted for a felony, and instructed BIGGERS to not call them to make any reports. FBI agent CURTIS D SOUTH informed BIGGERS to “not expect anything to be done” after BIGGERS provided him with evidence of the kidnappings of her children. THE FBI tracked, monitored, and spied on the Plaintiffs on behalf of their criminal enterprise. THE FBI participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. THE FBI was aware of and participated in the attempted murders of the Plaintiffs and colluded to blackball BIGGERS from professional wrestling and college athletics by falsifying a criminal record against BIGGERS. The FBI violated the plaintiffs BIVENS rights when they burglarized BIGGERS home without a warrant and stole BIGGERS electronic devices in Tampa and in El Paso. The FBI willingly allowed themselves to be used as a terrorist organization to target the Plaintiffs and participate in the conspiracy to interfere with the Plaintiffs civil rights.
1220. THE ARMY OFFICE OF THE INSPECTOR GENERAL showed a willful and deliberate indifference for crimes and civil rights violations being committed against the Plaintiffs on their watch. After learning of the crimes and injustices by the Plaintiffs filing of official complaints; THE INSPECTOR GENERAL simply swept the crimes under the rug. THE INPECTOR GENERAL colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked.
1221. UNITED STATES AIRFORCE , and AIRFORCE SECURITY SERVICES are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. The USAF AND AIRFORCE SECURITY SERVICES participated in the conspiracy to beat, rape , molest, falsely imprison, kidnap, and sex traffic BIGGERS and her children. They were aware of and participated in the attempted murders of the Plaintiffs. The USAF knowingly and intentionally created danger for the Plaintiffs when they released SIMS from custody against standard operating procedure after he was apprehended at the scene of the crime where BIGGERS was beaten unconscious and raped.
1222. THE STATE OF NEW JERSEY colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. THE STATE OF NEW JERSEY is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. THE STATE OF NEW JERSEY participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. THE STATE OF NEW JERSEY was aware of and participated in the attempted murders of the Plaintiffs. Additionally, THE STATE OF NEW JERSEY colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. THE STATE OF NEW JERSEY and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1223. THE STATE OF TEXAS colluded and conspired with the criminal enterprise as they showed a deliberate and willful indifference for well established constitutional rights and laws. They knowingly and intentionally failed to train their employees and failed to intervene in criminal acts committed

by their employees. THE STATE OF TEXAS created danger for the Plaintiffs by violating Court Orders, stalking, and kidnapping the Plaintiffs from a domestic violence shelter. THE STATE OF TEXAS is operating as a spearhead of the vast criminal enterprise by knowingly and intentionally unlawfully pursuing a criminal conviction against the Plaintiff although it is obvious that she was never indicted for any crime, nor has any valid probable cause warrant been issued for her arrest. THE STATE OF TEXAS fabricated and falsified evidence in their unlawful pursuit of BIGGERS by creating fictitious arrest warrants and fictitious indictments. Nearly 300 cases were dismissed from the EL PASO COUNTY DISTRICT ATTORNEY'S Office last year for failure to indict them. Quizzically, they have continued to rabidly pursue the wrongful conviction of BIGGERS even though no warrant for her arrest was issued and she has never been indicted.

1224. BEXAR COUNTY , TEXAS refused to intervene in the violation the Plaintiffs criminal no contact orders against their probationer, SIMS, assisted their probationer in violating domestic violence protective orders, supported and rewarded their probationer for violating the terms of his probation, assisted him in violating custody orders, and refused to intervene in their probationer stalking the victim as collusive act in unison with a vast network of law enforcement agencies working to advance the criminal enterprise
1225. THE EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE refused to intervene in the violation the Plaintiffs domestic violence protective orders, ordered law enforcement to not enforce Plaintiffs protective orders, ordered law enforcement to not enforce custody orders, and refused to intervene in any crime that the defendants committed against the Plaintiffs. This was a collusive act in unison with a vast network of law enforcement agencies working to advance the criminal enterprise; THE EL PASO COUNTY ATTORNEY'S OFFICE and JOANN BERNAL colluded and conspired to have BIGGERS falsely arrested and imprisoned, and refused to grant BIGGERS a domestic violence protective order when the defendant was actively violating his family violence no contact orders.
1226. THE CITY OF EL PASO, TX, EL PASO COUNTY, The EL PASO CONSTABLES OFFICE, and the EL PASO COUNTY SHERIFF unlawfully dispossessed the Plaintiffs of their home, assisted in the burglary of the Plaintiffs home, helped the Defendants commit crimes against the Plaintiffs, and allowed the Defendants to continuously commit violent crimes against them while they intentionally failed to intervene. These agencies and municipalities also assisted in the kidnapping of the Plaintiffs and the continued unlawful concealment of the kidnapped children's location. EL PASO POLICE DEPARTMENT and the EL PASO COUNTY SHERIFF refused to take reports from the Plaintiffs and intentionally violated custody and protective orders to advance the criminal enterprise.
1227. THE CHICAGO ILLINOIS POLICE DEPARTMENT refused to intervene in the violation the Plaintiffs domestic violence protective orders, custody orders, and refused to intervene in the Plaintiffs kidnappings as a collusive act in unison with a vast network of law enforcement agencies across the United States working to advance the criminal enterprise
1228. THE COOK COUNTY SHERIFF , COOK COUNTY ILLINOIS, THE CITY OF CHICAGO, THE CITY OF LYNWOOD, THE LYNWOOD POLICE DEPARTMENT, THE CITY OF MARKHAM, refused to intervene in the violation the Plaintiffs domestic violence protective orders, custody orders, and refused to intervene in the Plaintiffs kidnappings as a collusive act in unison with a vast network of law enforcement agencies working to advance the criminal enterprise.
1229. THE STATE OF ILLINOIS, CHAMPAIGN COUNTY ILLINOIS, THE CITY OF URBANA ILLINOIS, THE CITY OF CHAMPAIGN ILLINOIS, THE URBANA POLICE DEPARTMENT, THE CHAMPAIGN POLICE DEPARTMENT, and the CHAMPAIGN COUNTY SHERIFF assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. These named Defendants participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. Additionally, they were aware of and participated in the attempted murders of the Plaintiffs.
1230. THE SUFFOLK COUNTY DISTRICT ATTORNEY'S OFFICE displayed a willful and deliberate indifference for the fact that the Plaintiffs were kidnapped on their watch. THE SUFFOLK COUNTY

DISTRICT ATTORNEY'S OFFICE advised BIGGERS to "call the police" when they concluded that a crime had occurred against the Plaintiffs. THE SUFFOLK COUNTY DISTRICT ATTORNEY'S OFFICE colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested and sex trafficked. THE SUFFOLK COUNTY DISTRICT ATTORNEYS OFFICE is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children

1231. SUFFOLK COUNTY JUDGE 1 showed a willful and deliberate indifference to the fact that the Plaintiff and her children were kidnapped from BRIGHTER TOMORROW'S domestic violence shelter to assist in the conspiracy to interfere with the Plaintiffs civil rights.
1232. THE SHIRLEY POLICE DEPARTMENT , BROOKHAVEN, and THE HAMLET OF SHIRLEY colluded and conspired with the criminal enterprise as they showed a deliberate and willful indifference for well established constitutional rights. SUFFOLK COUNTY and THE SHIRLEY NEW YORK POLICE DEPARTMENT intentionally facilitated the violation of Court Orders when they kidnapped BIGGERS and her children from Brighter Tomorrows domestic violence shelter. These Defendants knowingly and intentionally failed to train their employees, and failed to intervene in criminal acts committed by their employees. SUFFOLK COUNTY , the SUFFOLK COUNTY PROSECUTORS OFFICE and THE SHIRLEY NEW YORK POLICE DEPARTMENT created danger for the Plaintiffs when they intentionally and knowingly failed to intervene in the kidnapping and stalking that happened on their watch. These actions and lack thereof were for the advancement of the criminal enterprise.
1233. NEW YORK POLICE DEPARTMENT assisted the STATE OF TEXAS in the conspiracy to violate the Plaintiffs civil rights when they kidnapped BIGGERS from her Midtown apartment. The NYPD refused to intervene in the violation the Plaintiffs domestic violence protective orders, custody orders, assisted in the kidnappings, and refused to intervene in the plaintiffs kidnappings as a collusive act in unison with a vast network of law enforcement agencies working to advance the criminal enterprise
1234. THE NEW YORK CITY PUBLIC DEFENDER conspired with the STATE OF TEXAS when they assisted in the false arrest and false imprisonment of BIGGERS. They also participated in the kidnapping of BIGGERS and her children by allowing her to be booked into prison despite the fact they were aware that BIGGERS was taken into custody without a warrant, without being indicted, and without probable cause. These fraudulent actions and lack thereof were done in conjunction with a mass network of Attorneys at war against the United States Constitution for the advancement of the criminal enterprise.
1235. THE MANHATTAN DISTRICT ATTORNEYS OFFICE conspired with the STATE OF TEXAS when they assisted in the false arrest and false imprisonment of BIGGERS. They also participated in the kidnapping of BIGGERS and her children by allowing her to be booked into prison despite the fact they were aware that BIGGERS was taken into custody without a warrant, without being indicted, and without probable cause. These fraudulent actions and lack thereof were done in conjunction with a mass network of officers of the Court at war against the United States Constitution for the advancement of the criminal enterprise.
1236. THE NYPD, THE CITY OF NEW YORK, THE NEW YORK PUBLIC DEFENDER, THE MANHATTAN DISTRICT ATTORNEYS OFFICE, NEW YORK COUNTY, THE NEW YORK COUNTY SHERIFF, and THE STATE OF NEW YORK showed a willful and deliberate indifference for the crimes being committed against the Plaintiffs and refused to intervene. These Defendants colluded and conspired with THE STATE OF TEXAS and the other co-conspirators to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. THE NYPD, THE CITY OF NEW YORK, THE MANHATTAN DISTRICT ATTORNEY, THE NEW YORK PUBLIC DEFENDER, THE CITY OF NEW YORK, NEW YORK COUNTY and THE STATE OF NEW YORK are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. THE NYPD, THE CITY OF NEW YORK, NEW YORK COUNTY, THE STATE OF NEW YORK, and THE

MANHATTAN DISTRICT ATTORNEYS OFFICE participated in the conspiracy kidnap and falsely imprison BIGGERS and to conceal the kidnapping of M.F. and Z.S. The NEW YORK COUNTY SHERIFF also stole BIGGERS state issued I.D., then messaged her on Facebook to inform her that he had stolen it.

1237. RIKERS CORRECTIONAL FACILITY assisted in the kidnapping of BIGGERS when they held her at their facility without a proper arrest and no warrant ever being issued for arrest.
1238. THE NEW YORK CITY SHERIFF, NEW YORK COUNTY, THE STATE OF NEW YORK and the NEW YORK POLICE DEPARTMENT all displayed willful and deliberate indifference to the fact that the plaintiffs were kidnapped and sex trafficked by refusing to enforce court orders and refusing to take police reports related to the crimes. They therefore also participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children.
1239. NEW YORK COUNTY DEFENDER SERVICES assisted the STATE OF TEXAS in kidnapping the plaintiffs, and refused to inform the Court that there was no warrant or probable cause for BIGGERS arrest. They also furthered their conspiracy by tampering with and destroying the evidence of their illegal actions.
1240. Therefore, NEW YORK COUNTY DEFENDER SERVICES is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. They also participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children.
1241. NEW YORK COUNTY DEFENDER SERVICES and its employees were aware of and participated in the attempted murders of the Plaintiffs and colluded to blackball BIGGERS from professional wrestling and college athletics.
1242. The FIRE DEPARTMENT of NEW YORK worked to advance the criminal enterprise when they violated their policies and procedures by hiring co-defendants in spite of their expansive and violent criminal record.
1243. STAMFORD CONNECTICUT POLICE DEPARTMENT , the STATE OF CONNECTICUT, and the CITY OF STAMFORD conspired with CHICAGO, NEW YORK, and TEXAS to kidnap the Plaintiffs.
1244. THE STAMFORD POLICE DEPARTMENT showed a willful and deliberate indifference for the fact that the Plaintiffs had been kidnapped, refused to take a report of the kidnappings, tampered with witnesses, and contacted the kidnappers to inform them that BIGGERS was trying to make a report.
1245. Likewise, they assisted in the stalking and unlawful surveillance of the Plaintiffs.
1246. The STAMFORD POLICE, THE CITY OF STAMFORD also threatened to arrest BIGGERS without probable cause when she dialed 911 to request their help.
1247. These Defendants were of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
1248. THE STATE OF CONNECTICUT, THE CITY OF STAMFORD, and THE STAMFORD POLICE DEPARTMENT participated in the conspiracy to rape , molest, kidnap, mutilate, and sex traffic BIGGERS and her children. They were aware of and participated in the attempted murders of the Plaintiffs.
1249. MOON TOWNSHIP POLICE DEPARTMENT, MOON TOWNSHIP,THE PITTSBURGH POLICE DEPARTMENT, ALLEGHENY COUNTY, KURT ANGLE, DETECTIVE MUNGER ,ANGELA ZANE, DENISE DEMARCO, MICHAEL SANTICOLA, MICHELLE SANTICOLA, MICHELLE WRIGHT,DAVE HAWK, KDKA PITTSBURGH, THE ALLEGHENY COUNTY PROSECUTORS OFFICE, JUDGE MARY MURRY conspired with NEW YORK, TEXAS, and ILLINOIS to deprive the Plaintiffs of their civil rights and obstruct justice in their pending cases. These Defendants are all responsible for their participation in the kidnappings and the conspiracy to kidnap the plaintiffs. At all times they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
1250. MOON TOWNSHIP POLICE DEPARTMENT, MOON TOWNSHIP,THE PITTSBURGH POLICE DEPARTMENT, ALLEGHENY COUNTY, KURT ANGLE, DETECTIVE MUNGER ,ANGELA ZANE, DENISE DEMARCO, MICHAEL SANTICOLA, MICHELLE SANTICOLA, MICHELLE WRIGHT,DAVE HAWK, KDKA

PITTSBURGH, THE ALLEGHENY COUNTY PROSECUTORS OFFICE, JUDGE MARY MURRY participated in the conspiracy to rape , molest, falsely imprison, kidnap, murder, and sex traffic BIGGERS and her children.

1251. MOON TOWNSHIP POLICE DEPARTMENT, MOON TOWNSHIP,THE PITTSBURGH POLICE DEPARTMENT, ALLEGHENY COUNTY, KURT ANGLE, DETECTIVE MUNGER ,ANGELA ZANE, DENISE DEMARCO, MICHAEL SANTICOLA, MICHELLE SANTICOLA, MICHELLE WRIGHT,DAVE HAWK, KDKA PITTSBURGH, THE ALLEGHENY COUNTY PROSECUTORS OFFICE, JUDGE MARY MURRY were aware of and participated in the attempted murders of the Plaintiffs.
1252. MOON TOWNSHIP POLICE DEPARTMENT, MOON TOWNSHIP,THE PITTSBURGH POLICE DEPARTMENT, ALLEGHENY COUNTY, KURT ANGLE, DETECTIVE MUNGER ,ANGELA ZANE, DENISE DEMARCO, MICHAEL SANTICOLA, MICHELLE SANTICOLA, MICHELLE WRIGHT,DAVE HAWK, KDKA PITTSBURGH, THE ALLEGHENY COUNTY PROSECUTORS OFFICE, and JUDGE MARY MURRY all showed a willful and deliberate indifference for the fact that sex crimes and kidnappings were occurring against the Plaintiffs for the advancement of the criminal enterprise.
1253. CTHE CITY OF MCDONOUGH GEORGIA, THE MCDONOUGH POLICE DEPARTMENT, HENRY COUNTY GEORGIA, THE CITY OF ATLANTA, THE ATLANTA POLICE DEPARTMENT and THE HENRY COUNTY DISTRICT ATTORNEYS OFFICE colluded and conspired with NEW YORK, TEXAS, NEW MEXICO and ILLINOIS to deprive the Plaintiffs of their civil rights. These Defendants conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. THE CITY OF MCDONOUGH, THE MCDONOUGH POLICE DEPARTMENT, HENRY COUNTY GEORGIA,THE ATLANTA POLICE DEPARTMENT, and THE HENRY COUNTY DISTRICT ATTORNEYS OFFICE are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. THE CITY OF MCDONOUGH, THE MCDONOUGH POLICE DEPARTMENT, HENRY COUNTY GEORGIA, THE CITY OF ATLANTA, and THE ATLANTA POLICE DEPARTMENT participated in the conspiracy to rape , terrorize, molest, falsely imprison, and sex traffic the Plaintiff and her children. THE CITY OF MCDONOUGH, THE MCDONOUGH POLICE DEPARTMENT,THE CITY OF ATLANTA, THE ATLANTA POLICE DEPARTMENT, and THE HENRY COUNTY DISTRICT ATTORNEYS OFFICE were aware of and participated in the attempted murders of the Plaintiffs. Additionally, These Defendants colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. These named Defendants and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1254. THE TAMPA FLORIDA POLICE DEPARTMENT, THE CITY OF TAMPA FLORIDA, THE HILLSBOROUGH COUNTY SHERIFF,THE HILLSBOROUGH COUNTY DISTRICT ATTORNEYS OFFICE, and THE STATE OF FLORIDA conspired with the STATE OF TEXAS, the STATE of NEW YORK, and the STATE of ILLINOIS to deprive the Plaintiffs of their civil rights. These Defendants colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked.
1255. THE STATE OF FLORIDA , former Judge ERIC MYERS and THE HILLSBOROUGH COUNTY DISTRICT ATTORNEY participated in the multi-state conspiracy when they published the Plaintiffs address where they were taking refuge from the criminal enterprise in a domestic violence shelter. THE STATE OF FLORIDA, ERIC MYERS, and THE HILLSBOROUGH COUNTY DISTRICT ATTORNEY also published the Plaintiffs cell phone number on the public docket. These actions were taken to assist in the stalking and attempted murders of the Plaintiffs.
1256. THE TAMPA POLICE DEPARTMENT,THE CITY OF TAMPA, MYERS, THE HILLSBOROUGH COUNTY SHERIFF,THE HILLSBOROUGH COUNTY DISTRICT ATTORNEYS OFFICE, and THE STATE OF FLORIDA participated in the multi-state conspiracy to interfere with and to deprive the Plaintiffs of their civil rights. These Defendants are responsible for the kidnappings and the conspiracy to kidnap because

they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. These government agencies and State actors participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. These named Defendants were aware of and participated in the attempted murders of the Plaintiffs. Additionally, these Defendants colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. These Defendants along with their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1257. THE LOS ANGELES POLICE DEPARTMENT, "LAPD" colluded and conspired with the criminal enterprise to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. The LAPD battered BIGGERS and handcuffed her in her own home without probable cause. The LAPD are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. The LAPD participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. The LAPD was aware of and participated in the attempted murders of the Plaintiffs. Additionally, the LAPD colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. The LAPD and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1258. LAS CRUCES POLICE DEPARTMENT "LCPD", THE CITY OF LAS CRUCES, DONA ANA COUNTY SHERIFF, AND DONA ANA COUNTY, NM participated in the multi-state conspiracy to interfere with the Plaintiff's civil rights and to obstruct justice. These Defendants allowed blatant protective order violations, allowed kidnapping, and refused to enforce the Plaintiffs custody and protective orders issued in their jurisdiction. THE LCPD, THE CITY OF LAS CRUCES, THE DONA ANA COUNTY SHERIFF, and DONA ANA COUNTY colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. THE LCPD, THE CITY OF LAS CRUCES, THE DONA ANA COUNTY SHERIFF, and DONA ANA COUNTY are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. THE LCPD, THE CITY OF LAS CRUCES, THE DONA ANA COUNTY SHERIFF, and DONA ANA COUNTY participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. THE LCPD, THE CITY OF LAS CRUCES, THE DONA ANA COUNTY SHERIFF, and DONA ANA COUNTY were aware of and participated in the attempted murders of the Plaintiffs. Additionally, These named Defendants colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. These Defendants and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1259. THE ORANGE COUNTY SHERIFF, and THE ORLANDO POLICE DEPARTMENT obtained autographs and photos with KURT ANGLE after he attempted to break BIGGERS neck at the HOLIDAY INN EXPRESS. THE ORANGE COUNTY SHERIFF and THE ORLANDO POLICE DEPARTMENT participated in the multi-state conspiracy to deprive BIGGERS of her civil rights by intentionally failing to intervene as well as encouraging that crimes be committed against BIGGERS. When BIGGERS made attempts to report ANGLE'S crimes, these law enforcement agencies instructed BIGGERS to " just let it go".

1260. THE ORANGE COUNTY SHERRIF, ORANGE COUNTY FLORIDA, THE CITY OF ORLANDO and THE ORLANDO POLICE DEPARTMENT colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. THE

ORANGE COUNTY SHERIFF, THE CITY OF ORLANDO, and THE ORLANDO POLICE DEPARTMENT are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. THE ORANGE COUNTY SHERIFF, THE CITY OF ORLANDO, and THE ORLANDO POLICE DEPARTMENT participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. THE ORANGE COUNTY SHERIFF, THE CITY OF ORLANDO, and THE ORLANDO POLICE DEPARTMENT were aware of and participated in the attempted murders of the Plaintiffs. Additionally, THE ORANGE COUNTY SHERIFF, THE CITY OF ORLANDO , AND THE ORANGE COUNTY SHERIFF colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. These above named Defendants and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise

1261. THE JACKSONVILLE ILLINOIS POLICE DEPARTMENT, MORGAN COUNTY ILLINOIS, THE CITY OF JACKSONVILLE ILLINOIS, RANDY DUVENDACK, THE STATE OF ILLINOIS, THE MORGAN COUNTY SHERIFF, colluded and conspired with the criminal enterprise when they unlawfully disposed the plaintiffs of their home, and allowed the Plaintiffs to be kidnapped by the LAWRENCE family. These Defendants colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. THE JACKSONVILLE POLICE DEPARTMENT, MORGAN COUNTY ILLINOIS, THE CITY OF JACKSONVILLE, RANDY DUVENDACK, THE MORGAN COUNTY SHERIFF, and THE STATE OF ILLINOIS are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. THE JACKSONVILLE POLICE DEPARTMENT, MORGAN COUNTY ILLINOIS, THE CITY OF JACKSONVILLE, RANDY DUVENDACK, THE MORGAN COUNTY SHERIFF, AND THE STATE OF ILLINOIS participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. THE JACKSONVILLE ILLINOIS POLICE DEPARTMENT, MORGAN COUNTY ILLINOIS, THE CITY OF JACKSONVILLE ILLINOIS, RANDY DUVENDACK, THE MORGAN COUNTY SHERIFF, and THE STATE OF ILLINOIS were aware of and participated in the attempted murders of the Plaintiffs. Additionally, THE JACKSONVILLE POLICE DEPARTMENT, MORGAN COUNTY ILLINOIS, THE CITY OF JACKSONVILLE ILLINOIS , THE MORGAN COUNTY SHERIFF, RANDY DUVENDACK, and THE STATE OF ILLINOIS colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. THE JACKSONVILLE POLICE DEPARTMENT, MORGAN COUNTY ILLINOIS, THE CITY OF JACKSONVILLE ILLINOIS, RANDY DUVENDACK, THE MORGAN COUNTY SHERIFF and THE STATE OF ILLINOIS and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1262. Lagos State and TB JOSHUA are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children.
1263. In addition to the most recent kidnappings, LAGOS STATE and TB JOSHUA orchestrated having BIGGERS held for ransom and kidnapped in Nigeria in 2010 and stalked her to New York City starting in 2021.
1264. LAGOS STATE, PAULA WHITE, and TB JOSHUA participated in the multi-state conspiracy to mutilate, murder, stalk, rape , molest, and sex traffic BIGGERS and her children. LAGOS STATE , PAULA WHITE and TB JOSHUA were aware of and participated in the attempted murders of the Plaintiffs. LAGOS STATE, TB JOSHUA, PAULA WHITE, and THE SYNOGOGUE CHURCH OF ALL NATIONS and their co-conspirators worked cohesively to steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. Additionally they

colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their real and intellectual property.

1265. PRISON TRANSPORT SYSTEMS or “PTS” participate in the multi-state conspiracy to kidnap the Plaintiffs from New York. PTS is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. PTS kidnapped BIGGERS from RIVERHEAD CORRECTIONAL FACILITY on behalf of the STATE OF TEXAS. PTS tampered with and destroyed evidence in BIGGERS pending civil case to ensure that BIGGERS was falsely imprisoned and that her custody and protective orders were not available to present to the Court. PTS violated BIGGERS freedom of religion and attempted to force her to eat pork. BIGGERS was subjected to cruel and inhumane treatment by PTS as they handcuffed her so tightly that the cuffs cut through her skin, forced her to starve if she didn’t eat pork, enticed other detainees to attack her, denied her access to bathroom break and water, and used firearms to facilitate her kidnapping. PTS and its employees participated in the conspiracy to rape , mutilate, molest, and sex traffic BIGGERS and her children. PTS physically abused BIGGERS and conspired to murder her by vehicular homicide in transport. PTS was aware of and participated in the attempted murders of the Plaintiffs
1266. El Paso County Jail participated in the conspiracy to interfere with BIGGERS civil rights by intentionally and knowingly falsely imprisoning her.
1267. Riverhead Correctional Facility participated in the conspiracy to interfere with BIGGERS civil rights by intentionally and knowingly falsely imprisoning her
1268. PRISON/JAIL DOE 1-10 and JAIL DOE 1-10 colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked.
1269. The ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES “DCFS” colluded with the criminal enterprise as they falsified findings and records, committed fraud upon the court, operated unlawfully as a branch of government, violated their own policies and procedures, and kidnapped the Plaintiff and her children. When BIGGERS reported the kidnappings and abuse to the ILLINOIS DEPARTMENT OF CHILDREN AND FAMILY SERVICES, they intentionally failed to complete the investigation and went on to assist in the unlawful concealment of the kidnapped children. ILLINOIS DCFS is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ILLINOIS DCFS participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. ILLINOIS DCFS was aware of and participated in the attempted murders of the Plaintiffs in lieu of covering for crimes against the Plaintiffs spanning over decades.
1270. EL PASO CHILD PROTECTIVE SERVICES colluded and conspired with the criminal enterprise as they falsified findings and records, committed fraud upon the court, acted unlawfully as a branch of government, violated their own policies and procedures, and kidnapped the Plaintiffs children from New York without a court order or jurisdiction. TEXAS CHILD PROTECTIVE SERVICES is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. TEXAS CHILD PROTECTIVE SERVICES participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. TEXAS CHILD PROTECTIVE SERVICES was aware of and participated in the attempted murders of the Plaintiffs.
1271. NEW YORK ADMINISTRATION FOR CHILDRENS SERVICES “ACS” colluded and conspired with the criminal enterprise as they falsified findings and records, committed fraud upon the court, acted unlawfully as a branch of government, violated their own policies and procedures, and kidnapped the Plaintiffs children. NEW YORK ACS is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings,

and unlawfully concealed the location of the kidnapped children. NEW YORK ACS was aware of and participated in the attempted murders of the Plaintiffs

1272. CHICAGO PUBLIC SCHOOLS,LYNWOOD ELEMENTARY SCHOOL, EL PASO INDEPENDENT SCHOOL DISTRICT, PARKER ELEMENTARY SCHOOL violated BIGGERS custody orders for M.F., violated domestic violence protective order for M.F., and unlawfully concealed and kidnapped the BIGGERS children.
1273. THE NEW YORK PUBLIC LIBRARY colluded and conspired with the criminal enterprise by unlawful surveillance, stalking and monitoring of the Plaintiff.
1274. STAMFORD CONNECTICUT HOUSING AUTHORITY and BAYONNE HOUSING AUTHORITY colluded and conspired with the criminal enterprise through discriminatory housing practices and the unlawful monitoring and stalking of the Plaintiffs.
1275. CANON CITY FAMILY CRISIS SERVICES, the YWCA PUEBLO and BRIGHTER TOMORROWS willfully and intentionally failed to protect the Plaintiffs and created danger for the plaintiffs by assisting the defendants in their acts of stalking and kidnapping .
1276. LA CASA INC. colluded and conspired with the criminal enterprise to deny BIGGERS and her children protection from their abusers. Not only did they intentionally and willfully fail to protect the Plaintiffs, they also breached BIGGERS confidentiality when they violated BIGGERS Orders of protection. This domestic violence shelter stalked and monitored the Plaintiffs on behalf of their abusers. LA CASA destroyed and stole the Plaintiffs personal property. LA CASA is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LA CASA participated in the conspiracy to rape , molest, falsely imprison, and sex traffic BIGGERS and her children. LA CASA was aware of and participated in the attempted murders of the Plaintiffs
1277. BRIGHTER TOMORROWS Inc. colluded and conspired with the criminal enterprise to deny BIGGERS and her children protection from their abusers. Not only did they intentionally and willfully failed to protect BIGGERS and her co- plaintiff children M.F. and Z.S. BRIGHTER TOMORROWS also breached BIGGERS confidentiality when they violated BIGGERS Orders of protection and allowed the SHIRLEY NEW YORK POLICE DEPARTMENT to enter the shelter and kidnap BIGGERS, M.F. and Z.S. BRIGHTER TOMORROWS domestic violence shelter stalked and monitored the Plaintiffs on behalf of their abusers. BRIGHTER TOMORROWS is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. BRIGHTER TOMORROWS participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. BRIGHTER TOMORROWS was aware of and participated in the attempted murders of the Plaintiffs
1278. THE CENTER AGAINST SEXUAL AND FAMILY VIOLENCE colluded and conspired with the criminal enterprise to deny BIGGERS and her children protection from their abusers. Not only did they intentionally and willfully fail to protect BIGGERS, they also breached BIGGERS confidentiality when they violated BIGGERS Orders of protection. This domestic violence shelter stalked and monitored the Plaintiffs on behalf of their abusers.
1279. EL PASO MOTHERS AGAINST FAMILY COURT ABUSE colluded and conspired with the criminal enterprise by assisting their co-conspirators in stalking and kidnapping the Plaintiffs.
1280. HOUSTON AREA WOMENS SHELTER colluded and conspired with the criminal enterprise to deny BIGGERS and her children protection from their abusers. Not only did they intentionally and willfully fail to protect the Plaintiffs, they also breached BIGGERS confidentiality when they violated BIGGERS Orders of protection. This domestic violence shelter stalked and monitored the Plaintiffs on behalf of their abusers.

1281. THE BRIDGE OVER TROUBLED WATER INC. colluded and conspired with the criminal enterprise to deny BIGGERS and her children protection from their abusers. Not only did they intentionally and willfully fail to protect the Plaintiffs, they also breached BIGGERS confidentiality when they violated BIGGERS Orders of protection. This domestic violence shelter stalked and monitored the Plaintiffs on behalf of their abusers.
1282. THE NATIONAL COALITION AGAINST DOMESTIC VIOLENCE colluded and conspired with the criminal enterprise by refusing to protect the Plaintiffs. This organization assisted the criminal enterprise in stalking and kidnapping the Plaintiffs.
1283. REYNOLD'S HOUSE and its employees colluded and conspired with the criminal enterprise to deny BIGGERS and her children M.F. and Z.S. protection from their abusers. Not only did they intentionally and willfully fail to protect BIGGERS, they also breached BIGGERS confidentiality when they violated BIGGERS Orders of protection. This domestic violence shelter stalked and monitored the Plaintiffs on behalf of their abusers. After failing to protect the Plaintiffs, REYNOLDS HOUSE stole all of the Plaintiffs personal belongings that they brought with them to the shelter. BIGGERS had to get a court order to force REYNOLDS HOUSE to release her and her children's property. REYNOLDS HOUSE is responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. REYNOLDS HOUSE participated in the conspiracy to rape, molest, and sex traffic BIGGERS and her children. REYNOLDS HOUSE was aware of and participated in the attempted murders of the Plaintiffs;
1284. CHICAGO LEGAL AID consulted with BIGGERS concerning the kidnapping of her children by LIONEL JEAN BAPTISTE, GLEN FULTON, XAVIER FULTON, AMANDA FULTON and ASHLEY FULTON. After CHICAGO LEGAL AID reviewed the case, they discovered that BIGGERS children had been kidnapped. CHICAGO LEGAL AID then intentionally failed to intervene or notify law enforcement of the kidnappings..
1285. TEXAS RIO GRANDE LEGAL AID and STEPHANIE JAMES are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. JAMES and TRLA participated in the conspiracy to rape, molest, falsely imprison, and sex traffic BIGGERS and her children. JAMES and TRLA was aware of and participated in the attempted murders of the Plaintiffs
1286. BIGGERS consulted with TRLA about the unlawful dispossession of her residence at 3081 Tierra Salada Drive. Although the court records clearly reflected that BIGGERS was evicted after winning the case, TRLA stated that they could not assist her in gaining access back into her home.
1287. NEW YORK LEGAL ASSISTANCE GROUP "NYLAG", LIFE -SPANN, ALISON NEAL, and the TEXAS ADVOCACY GROUP agreed to assist BIGGERS in recovering her kidnapped children. These individuals and organizations had no intention of providing her legal services. NYLAG knowingly and intentionally allowed their paralegals to give bad legal advice that would lead to BIGGERS claim being dismissed.
1288. NYLAG, LIFE-SPANN, NEAL and the TEXAS ADVOCACY GROUP operated as a part of a vast network of non profit organizations and attorneys who are at war against constitution with the goal of advancing their criminal enterprise. These individuals and organizations agreed to assist the Plaintiffs with the intent of sabotaging their case and allowing the children to remained kidnapped.
1289. THE RAINBOW COALITION, JESSEE JACKSON, NAAN, and AL SHARPTON colluded and conspired with the criminal enterprise as they assisted in the stalking and kidnapping of BIGGERS and her children. The NAAN and The RAINBOW COALITION spent vast amounts of time pretending to assist the Plaintiffs and conducted long intakes of her case for the sole purpose of conducting discovery for their co-conspirators. JACKSON, SHARPTON, NAAN, and THE RAINBOW COALITION are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped

children. JACKSON, SHARPTON, NAAN, and the RAINBOW COALITION participated in the conspiracy to rape , molest ,falsely imprison, and sex traffic BIGGERS and her children. At all times they were aware of and participated in the attempted murders of the Plaintiffs.JACKSON, SHARPTON, THE RAINBOW COALITION and NAAN operated as a part of a vast network of non profits and public figures who are at war against constitution with the goal of advancing their criminal enterprise.

1290. JAMES MULLADY coordinated the kidnapping and concealment of BIGGERS children by XAVIER FULTON in 2011. JIM MULLADY committed fraud upon the court in forging BIGGERS signature on Court documents, claiming that BIGGERS agreed to no income withholding and securing a child support order without BIGGERS participation. MULLADY also assisted in the kidnapping of M.F.'s siblings that she was born with from BIGGERS womb.
1291. PAULA MICHELLE WHITE colluded and conspired with the criminal enterprise as she participated in the kidnappings of BIGGERS and her children. WHITE stalked BIGGERS under the guise of being a Pastor of a church on behalf of the criminal enterprise. WHITE was aware of and concealed the sexual abuse, rape, molestation, kidnapping, and sex trafficking of BIGGERS and her children . WHITE organized a trip to Lagos Nigeria with the intent to have BIGGERS kidnapped and killed in Africa. WHITE attempted to steal BIGGERS passport in Nigeria.WHYTE facilitated the attempted murder of BIGGERS by vehicular homicide and also had BIGGERS disfigured by having her skin burned off by HEATH MILLER. WHITE tortiously interfered with BIGGERS business contracts, kidnapped BIGGERS children, and sabotaged BIGGERS personal relationship through defamation.
1292. DAVID WOLKINSON stalked, harassed and attempted to murder the Plaintiffs for the advancement of the criminal enterprise. WOLKINSON also and conspired to conceal the rape, kidnapping, molestation and sex trafficking of BIGGERS and her children.
1293. RICHARD BRUCE THARPE along with WOLKINSON are lead counselors of **KURT ANGLE'S** domestic terrorist organization. THARPE accepted BIGGERS civil case with no intention of providing her legal services. THARPE'S only intent in accepting BIGGERS family law case was to have BIGGERS and her children kidnapped, silenced and murdered on behalf of the criminal enterprise. THARPE brought in THEOLA HAGGER to assist him in completing the conspiracy to have the Plaintiffs sex trafficked, kidnapped, and murdered. HAGGER agreed to and participated in the conspiracy. While acting as BIGGERS attorney, THEOLA HAGGER was in possession of BIGGERS kidnapped children.
1294. VICTOR PARRA accepted BIGGERS civil case with no intention of providing her legal services. PARRA assisted in and turned a blind eye to acts of fraud upon the court. PARRA agreed to represent BIGGERS to cause her irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise;
1295. FELIX VALENZUELA fraudulently sought a writ of possession for BIGGERS home after BIGGERS defeated his clients in eviction court. After receiving a letter informing him that he and his clients were committing fraud, VALENZUELA proceeded to commit the fraud anyway.
1296. As of today, 06/19/2023, ASHLEY MARTINEZ is attempting to kidnap BIGGERS from new York City by false arrest. MARTINEZ is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MATINEZ showed a willful and deliberate indifference for the sex crimes, human trafficking and kidnappings of the Plaintiffs. MARTINEZ participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children.
1297. MARTINEZ was aware of and participated in the attempted murders of the Plaintiffs by poisoning them, by gunshot, and by vehicular homicide.
1298. MICHAEL F. SANTICOLA was the ALLEGHENY COUNTY SOLICITOR and also KURT ANGLE's privately retained attorney. SANTICOLA sat behind KURT ANGLE during his criminal proceedings in which BIGGERS was the victim. SANTICOLA'S wife, MICHELLE SANTICOLA represented ANGLE in his criminal trials with full knowledge that she was not allowed to represent ANGLE as the wife of the ALLEGHENY

COUNTY SOLICITOR. MICHAEL and MICHELLE SANTICOLA conspired to interfere with BIGGERS civil rights along with JUDGE MARY MURRAY as they fraudulently and unethically corrupted KURT ANGLE's criminal proceedings denying BIGGERS crime victims rights. The ALLEGHENY COUNTY SOLICITORS OFFICE intentionally failed to communicate court dates with BIGGERS and conducted hearings without her knowledge. After her husband's office failed to inform BIGGERS of hearings, MICHELLE SANTICOLA went on the local news and blamed BIGGERS for not attending trials that she was never informed of. While serving as county solicitor, MICHAL SANTICOLA went on the local news in Pittsburgh and proclaimed that BIGGERS, the listed victim in his office, was a "liar" and that KURT ANGLE was innocent. When SANTICOLA made these statements he was aware that he was lying and that KURT ANGLE was guilty. SANTICOLA by and through Santicola, Steele, & Fedeles stole BIGGERS paychecks on behalf of KURT ANGLE, then paid BIGGERS \$800.00 out of millions that were stolen by ANGLE. SANTICOLA is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. SANTICOLA and his firm participated in the conspiracy to rape, molest, and sex traffic BIGGERS and her children. SANTICOLA and his firm were aware of and participated in the attempted murders of the Plaintiffs

1299. DANA LEVINE by and through POLLOCK, BEGG, and KOMAR accepted BIGGERS civil case with no intention of providing her legal services. LEVINE assisted in and turned a blind eye to acts of fraud upon the court. LEVINE agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. LEVINE failed to provide BIGGERS with the protective order that was issued against ANGLE. LEVINE'S actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise
1300. ARYN WILLIAMS VANN promised to accept BIGGERS civil case with no intention of providing her legal services. VANN assisted in and turned a blind eye to acts of fraud upon the court. VANN agreed to represent BIGGERS to conduct discovery for the opposing party and to cause BIGGERS irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise
1301. ANTHONY CORONA of the EL PASO POLICE DEPARTMENT asked BIGGERS to officially file charges for the kidnapping of M.F. after he reviewed her report. Next, CORONA intentionally failed to intervene in the kidnapping of M.F. .CORONA assisted in the kidnapping of M.F. and Z.S. by intentional and deliberate indifference to the reality of their kidnappings and subsequently failing to intervene.
1302. AILEENE ROBINSON of the CHICAGO POLICE DEPARTMENT assisted in the kidnapping of M.F. by showing deliberate indifference to the fact that the child had been kidnapped. ROBINSON intentionally and willful failed to intervene to advance the criminal enterprise.
1303. BRENDAN DAVIS by and through JOHN BUCMILLER and ASSOCIATES accepted BIGGERS civil case with no intention of providing her legal services. DAVIS assisted in and turned a blind eye to acts of fraud upon the court. DAVIS agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm.
1304. DAVIS is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. DAVIS participated in the conspiracy to rape, molest, and sex traffic BIGGERS and her children. DAVIS was aware of and participated in the attempted murders of the Plaintiffs These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise
1305. PHILLIP KATZ accepted BIGGERS civil case with no intention of providing her legal services. KATZ assisted in and turned a blind eye to acts of fraud upon the court. KATZ agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. KATZ intentionally "no-showed" two scheduled hearings for BIGGERS to

sabotage her cases. KATZ actions and lack of actions were done in agreement with a vast network of attorneys and officers of the Court who are at war against the United States Constitution to advance their criminal enterprise

1306. KRISTAL KLAFFKA, and THE US MARSHALL SERVICE are responsible for the kidnappings and the conspiracy to kidnap because they aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. KLAFFKA, WOLKINSON, and The US MARSHAL SERVICE showed a deliberate and willful indifference to the facts that the Plaintiffs were suffering human trafficking, sex crimes and kidnappings as they intentionally failed to intervene. In addition to their failure to intervene, the US MARSHALL Service kidnapped BIGGERS from her Manhattan apartment, falsely arrested her, and took her to Rikers Island to be falsely imprisoned. KLAFFKA and the US MARSHALL SERVICES took these actions against BIGGERS to retaliate against her for reporting the kidnappings of her children and to advance the criminal enterprise.
1307. Attorney JOHN BUCHMILLER and Attorney BRENDAN DAVIS accepted BIGGERS civil case with no intention of providing her legal services. BUCHMILLER assisted in and turned a blind eye to acts of fraud upon the court. BUCHMILLER agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise
1308. RAFAEL MORALES accepted BIGGERS fraudulent criminal case with no intention of providing her legal services. MORALES intended the entire time to have BIGGERS falsely imprisoned. MORALES assisted in and turned a blind eye to acts of fraud upon the court. MORALES agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. MORALES coordinated the kidnappings of the Plaintiffs from New York to El Paso. RAFAEL MORALES later left private practice and joined the EL PASO COUNTY PUBLIC DEFENDERS OFFICE to block BIGGERS from getting their assistance. While MORALES was BIGGERS court appointed attorney, he pressured BIGGERS to plead guilty to crimes he was aware that she did not commit, faked car accidents and no-showed hearings, stalked BIGGERS and helped the criminal enterprise kidnap her from Brighter Tomorrows domestic violence shelter.
1309. MORALES colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. MORALES is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MORALES participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. MORALES aware of and participated in the attempted murders of the Plaintiffs. Additionally, MORALES colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. MORALES and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1310. MORALES was aware of and participated in the attempted murders of the Plaintiffs. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise;
1311. MARCUS GRAY accepted BIGGERS civil case with no intention of providing her legal services. GRAY assisted in and turned a blind eye to acts of fraud upon the court. GRAY agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause the Plaintiffs irreparable harm. GRAY assisted in the fraudulent alteration of BIGGERS order of protection against FULTON and breached attorney client privilege by divulging BIGGERS information to LEROY EKECHUKWU. FURTHERMORE, GRAY is responsible for the kidnappings and the conspiracy to kidnap

because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. GRAY participated in the conspiracy to rape, molest, and sex traffic BIGGERS and her children. GRAY was aware of and participated in the attempted murders of the Plaintiffs. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise.

1312. DEREK QUINATA and VICTOR PARA accepted BIGGERS fraudulent criminal case with no intention of providing her legal services. QUINATA and PARA accepted appointment to BIGGERS case so that they could ensure that BIGGERS was ultimately falsely imprisoned. QUINATA and PARA turned a blind eye to acts of fraud upon the court and ignored the fact that no arrest warrant or indictment for BIGGERS ever existed. QUINATA and PARA agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. QUINATA WORKED WITH Medrano AND THE EL PASO COUNTY PROSECUTORS OFFICE to secure a wrongful conviction of BIGGERS for a crime in which she was never arrested for. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise.
1313. ATTORNEY Gregory Anderson accepted BIGGERS criminal case with no intention of providing her legal services. ANDERSON assisted in and turned a blind eye to acts of fraud upon the court. ANDERSON assisted and concealed the kidnapping and false arrest of BIGGERS by the NYPD. ANDERSON agreed to represent BIGGERS to have BIGGERS falsely imprisoned, conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. At all times ANDERSON was aware that no warrant nor any indictment for BIGGERS existed, and that BIGGERS was the listed victim for the STATE of TEXAS while she was being unlawfully prosecuted. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise. While working in the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE, ANDERSON refused to accept BIGGERS case for being repeatedly drugged and raped. BIGGERS also previously consulted with ANDERSON concerning the unlawful dispossession of her residence at 3081 Tierra Salada Drive. ANDERSON refused to represent BIGGERS on the rape case against EPHRAM SIMS and the unlawful dispossession cases, yet insisted on remaining her criminal defense attorney. BIGGERS was forced to file a grievance against ANDERSON to get him to inform the Court of the conflict of interest.
1314. Judge ANGIE BARILL was BIGGERS classmate from kindergarten through high school, BIGGERS basketball teammate, and BIGGERS roommate at ILLINOIS COLLEGE. The next time BIGGERS saw BARILL she was the Judge presiding over the fictitious criminal case from the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE. BARILL is currently attempting to kidnap BIGGERS by false arrest from New York City. BARILL has the intent to have BIGGERS murdered. BARILL has issued a fictitious warrant for BIGGERS with full knowledge that the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE never secured an indictment, nor was any arrest warrant ever issued for BIGGERS arrest. BARILL, SAMUEL 'SAM' MEDRANO, and the EL PASO COUNTY DISTRICT ATTORNEYS OFFICE are desperate to get BIGGERS back to EL PASO to murder her and cover their acts of Fraud Upon the Court.
1315. RICHARD ROUNTREE posed as BIGGERS psychologist after she and her children were kidnapped in New York. ROUNTREE was monitoring BIGGERS for the criminal enterprise.
1316. ALLISON NEAL and ALLISON BENTON have appeared numerous times throughout the conspiracy to interfere with the Plaintiffs civil rights. ONEAL and BENTON posed as therapist and as BIGGERS attorney with the TEXAS ADVOCACY PROJECT to assist in the kidnapping and unlawful concealment of BIGGERS kidnapped children.
1317. AISHA CARR was BIGGERS teammate at FLORIDA STATE UNIVERSITY. The next time BIGGERS saw CARR she was CAPTAIN CARR at FORT BLISS and intentionally concealing crimes against the Plaintiffs

on behalf of the ARMY at FORT BLISS. CARR turned a blind eye to the rape of BIGGERS and the kidnapping of BIGGERS children.

1318. Attorney SHANE ONEAL aka STAN BERNSTEIN accepted BIGGERS fraudulent criminal case with no intention of providing her legal services. ONEAL assisted in and turned a blind eye to acts of fraud upon the court. ONEAL agreed to represent BIGGERS with the intent to have BIGGERS falsely imprisoned, to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise. Furthermore, STAN BERNSTEIN or "SHANE O'NEAL" drugged and raped BIGGERS while she was employed as a real estate property manager by his company BMI Management. BIGGERS was pregnant while BERNSTEIN/ONEAL raped her. ONEAL colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. ONEAL is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ONEAL participated in the conspiracy to rape, molest, falsely imprison, and sex traffic the Plaintiff and her children. ONEAL was aware of and participated in the attempted murders of the Plaintiffs. Additionally, ONEAL colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. ONEAL and his co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1319. Judge MARY MURRAY and Judge RANDALL B ROSENBAUM committed fraud upon the court to deprive the Plaintiffs of their civil rights.
1320. Attorney GINA SABBIA and GENA OLNEY participated in the conspiracy to deprive the Plaintiffs of their civil rights. As TROY BROWN'S assistant, GENA OLNEY tampered with and sabotaged BIGGERS family court cases and instructed BIGGERS to take detrimental actions in her pending cases. GENA OLNEY stalked BIGGERS from Florida to El Paso sabotaging her employment and court proceedings.
1321. OLNEY and SABBIA colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. OLNEY and SABBIA are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. OLNEY and SABBIA participated in the conspiracy to rape, molest, falsely imprison, and sex traffic the Plaintiff and her children. OLNEY and SABBIA were aware of and participated in the attempted murders of the Plaintiffs. Additionally, OLNEY and SABBIA colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. OLNEY, SABBIA, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1322. KENDREA MEYER is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MEYER participated in the conspiracy to rape, molest, and sex traffic BIGGERS and her children. MEYER was aware of and participated in the attempted murders of the Plaintiffs. MEYER was aware of and concealed the drugging and rapes of BIGGERS at the COLLEGE OF SOUTHERN IDAHO
1323. Judge STEPHEN B ABLES furthered the conspiracy and assisted in the kidnappings of BIGGERS and her children by allowing the STATE OF TEXAS to pursue a felony conviction against BIGGERS although no warrant was issued for BIGGERS arrest. ABLES was aware that no grand jury indicted BIGGERS and refused to recuse MEDRANO after viewing evidence of blatant judicial misconduct and fraud.

1324. SAMUEL 'SAM' MEDRANO ordered BIGGERS to be kidnapped twice without any valid arrest warrant. MEDRANO orchestrated the kidnapping of BIGGERS and her children from BRIGHTER TOMORROW'S domestic violence shelter in Shirley , New York. MEDRANO attempted to place an ankle monitor on BIGGERS although she had never been formally charged with any crime. After MEDRANO had BIGGERS, Z.S. and M.F. kidnapped in New York, he then wrote family court orders concerning BIGGERS children from his 409th District Court with full knowledge he did not have any authority or any jurisdiction to do so. During a live ZOOM hearing, MEDRANO made plans to have ex-parte conversations about the fictional criminal case against BIGGERS . Although MEDRANO was fully aware that BIGGERS was never charged with or indicted for any crime, MEDRANO continued to hold fictitious hearings and hand select Court Appointed attorneys whom he believed would assist him in securing a wrongful conviction against BIGGERS. MEDRANO signed a fictitious arrest warrant that accused BIGGERS of felony kidnapping and ordered the NYPD and US MARSHALL service to kidnap BIGGERS for a second time. MEDRANO is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MEDRANO participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. MDRANO was aware of and participated in the attempted murders of the Plaintiffs.
1325. EL PASO DISTRICT ATTORNEY BILL HICKS and ASSISTANT DISTRICT ATTORNEY MARK SPINN colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. As of today, 06/19/2023, El Paso District Attorney BILL HICKS allowing his assistant district attorney ASHLEY MARTINEZ to again attempt kidnap BIGGERS from New York City by false arrest and has refused to drop the fictional criminal charges against BIGGERS. HICKS is fully aware that BIGGERS was never indicted and that no warrant for her arrest was ever been issued. Attorney YVONNE ROSALES, Attorney VERONICA LERMA, and Assistant District Attorney ASHLEY MARTINEZ colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. As BIGGERS court appointed attorney, LERMA intentionally failed to inform the Court that BIGGERS was never indicted, that no warrant had been issued for her arrest. LERMA went to extremes to complete the conspiracy of falsely imprisoning BIGGERS when she asked BIGGERS to plead "insanity" or be declared "incompetent" to stand trial. LERMA did not have a scintilla of evidence to suggest that BIGGERS was insane or incompetent. LERMA also attempted to trick BIGEGRS into pleading guilty, stalked BIGGERS through her other client SAMANTHA ROBINSON, and obliterated attorney client privilege.
1326. ROSALES, LERMA, and MARTINEZ are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ROSALES, LERMA, and MARTINEZ participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. ROSALES, LERMA, and MARTINEZ were aware of and participated in the attempted murders of the Plaintiffs. Additionally, ROSALESS, LERMA, and MARTINEZ colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. ROSALES, LERMA, and MARTINEZ and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1327. Judge RUTH REYES and EUNICE REYES accepted BIGGERS civil case with no intention of providing her legal services. Judge REYES was BIGGERS co-worker and roommate in Albuquerque New Mexico. The next time BIGGERS saw REYES, she was attempting to falsely imprison her and acting as presiding Judge over fictional criminal cases in El Paso. RUTH and EUNICE assisted in and turned a blind eye to acts of fraud upon the court. RUTH and EUNICE agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm.

1328. RUTH later was elected judge and began targeting and falsely imprisoning BIGGERS. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise
1329. OUISA DAVIS accepted BIGGERS civil case with no intention of providing her legal services. DAVIS assisted in and turned a blind eye to acts of fraud upon the court. DAVIS agreed to represent BIGGERS with the intent to have BIGGERS falsely arrested, the intent to have BIGGERS children kidnapped, to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise;
1330. OUISA DAVIS colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, mutilated, molested, falsely imprisoned, and sex trafficked. DAVIS is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. DAVIS participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. DAVIS was aware of and participated in the attempted murders of the Plaintiffs. Additionally, DAVIS colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. DAVIS and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise
1331. Attorney THEOLA MARIE HAGGER kidnapped BIGGERS children. Next, she accepted BIGGERS civil case with no intention of providing her legal services. HAGGER assisted in and turned a blind eye to acts of fraud upon the court. HAGGER agreed to represent BIGGERS to participate in and conceal the kidnapping of BIGGERS children, conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise;
1332. CHRISTINA COCORAN accepted BIGGERS housing court case in New York City with no intention of providing her legal services. COCORAN is currently committing fraud upon the court as she is aware of a preexisting conflict of interest. The intent of Cocoran is to have BIGGERS evicted. COCORAN agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, and to cause BIGGERS irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise;
1333. Judge JESUS URENDA issued fictitious and fraudulent Writs of Possession against the Plaintiffs to unlawfully dispossess them of their property. URENDA colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. URENDA is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. URENDA participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. URENDA was aware of and participated in the attempted murders of the Plaintiffs. Additionally, URENDA colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. URENDA and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise:
1334. Chicago Judge MARY TREW conducted a custody hearing for BIGGERS kidnapped children with full knowledge that she had no jurisdiction, and even more shockingly that the case did not exist in her Court. A UCCJEA conference was held and it was determined that the State of Texas never gave

up jurisdiction of BIGGERS kidnapped children that TREW ruled upon. Next, BIGGERS filed a Motion to Vacate Judge TREW'S void custody orders based upon the results of the UCCJEA hearing. TREW refused to vacate the Orders in the face of her own acknowledgement that she had no jurisdiction. TREW colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested, falsely imprisoned and sex trafficked. TREW is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. TREW participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. TREW was aware of and participated in the attempted murders of the Plaintiffs. Additionally, TREW colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. TREW and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise;

1335. ROBERT O'ROURKE, VERONICA ESCOBAR, BENITO TORRES, ROBERT "PAT " WHITE, and the UNITED STATES OF AMERICA assisted in the stalking and kidnapping of plaintiffs and her children, tampered with and destroyed evidence in ongoing investigations, and assisted in the pursuit of the false arrest and wrongful conviction against BIGGERS for the advancement of the criminal enterprise.
1336. O'ROURKE, ESCOBAR, TORRESS and WHITE colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested falsely imprisoned, and sex trafficked. O'ROURKE, ESCOBAR, TORRES and WHITE are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. O'ROURKE, ESCOBAR, TORRES, and WHITE participated in the conspiracy to rape , molest, and sex traffic the Plaintiffs and her children. O'ROURKE , ESCOBAR, TORRES, and WHITE were aware of and participated in the attempted murders of the Plaintiffs. Additionally, O'ROURKE, ESCOBAR, TORRES, and WHITE colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. O'ROURKE, ESCOBAR, TORRES, and WHITE along with their co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise;
1337. EDUARDO LERMA colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. EDUARDO is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. EDUARDO participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. EDUARDO was aware of and participated in the attempted murders of the Plaintiffs. Additionally, EDUARDO colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. EDUARDO and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise
1338. EDUARDO LERMA JR. colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. EDUARDO is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. EDUARDO participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. EDUARDO was aware of and participated in the attempted murders of the Plaintiffs. Additionally, EDUARDO colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. EDUARDO and the co-conspirators also worked cohesively to

blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise;

1339. STEPHANIE JAMES and TRLA accepted BIGGERS civil case with no intention of providing her legal services. JAMES assisted in and turned a blind eye to acts of fraud upon the court. JAMES agreed to represent BIGGERS to conduct discovery for the opposing party, tamper with and destroy evidence, assist in the kidnapping of BIGGERS children , and to cause BIGGERS irreparable harm. These actions and lack of actions were done in agreement with a vast network of attorneys who are at war against the United States Constitution to advance their criminal enterprise;
1340. Mayor DEE MARGO ordered El Paso law enforcement to violate the Plaintiffs civil rights and to allow crimes to be committed against them. MARGO colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. MARGO instructed law enforcement to not intervene and to violate court Orders. MARGO is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. MARGO participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. MARGO was aware of and participated in the attempted murders of the Plaintiffs. Additionally, MARGO colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. MARGO and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise;
1341. Mayor LORI LIGHTFOOT ordered all Chicago law enforcement to not enforce the Plaintiffs custody and protective orders. LIGHTFOOT colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested , falsely imprisoned, and sex trafficked. LIGHTFOOT instructed law enforcement to not intervene in crimes and to violate court Orders. LIGHTFOOT is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. LIGHTFOOT participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. LIGHTFOOT was aware of and participated in the attempted murders of the Plaintiffs. Additionally, LIGHTFOOT colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. LIGHTFOOT and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise;
1342. THE EL PASO TIMES NEWS PAPER knowingly and intentionally falsely published that BIGGERS was indicted for felony interference with child custody and that she was "El Paso's Most Wanted". BIGGERS, M.F., and Z.S. were kidnapped from BRIGHTER TOMORROW'S domestic violence shelter as a result of this untruthful publication. The EL PASO TIMES NEWSPAPER took these action to assist in the conspiracy to have the Plaintiffs stalked, kidnapped, murdered, raped, molested , falsely imprisoned, and sex trafficked.;
1343. MATTHEW PEZZULLO conspired to stalk, monitor, and to sex traffic BIGGERS without her knowledge or consent to support the criminal activities of the criminal enterprise.
1344. ROY HARRIS falsified Z.M.'s birth certificate asserting that she was a single birth when multiple children were born with her. This act was done to assist in the kidnapping of Z.S's siblings from BIGGERS womb on 05/17/2016 at WILLIAM BEAUMONT ARMY MEDICAL CENTER.
1345. MEGAN PACHECO colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested and sex trafficked when she took BIGGERS to the facility where her children were ripped from her womb. PACHECO is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings,

and unlawfully concealed the location of the kidnapped children. PACHECO participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. PACHECO was aware of and participated in the attempted murders of the Plaintiffs. Additionally, PACHECO colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. PACHECO and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise

1346. SANDRA GRAY and THE COMPASS ROSE FOUNDATION conspired to sex traffic BIGGERS while she was employed as an Admissions Counselor at Sunstate Academy. GRAY colluded and conspired to have the Plaintiffs stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. GRAY is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. GRAY participated in the conspiracy to rape , molest, and sex traffic the Plaintiff and her children. GRAY was aware of and participated in the attempted murders of the Plaintiffs. Additionally, GRAY colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. GRAY and the co-conspirators also worked cohesively to blackball BIGGERS from professional wrestling, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise. These actions were taken for the advancement of their criminal enterprise
1347. SHAMIKA LAWRENCE and SHANTEL TERRY colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. SHAMIKA and SHANTEL are responsible for the kidnappings and the conspiracy to kidnap because they were aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. SHAMIKA and SHANTEL participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. SHAMIKA and SHANTEL were aware of and participated in the attempted murders of the Plaintiffs. Additionally, SHAMIKA and SHANTEL colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. SHAMIKA, SHANTEL, and their co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1348. ANA TUISILA colluded and conspired to have the Plaintiffs mutilated, physically assaulted, stalked, kidnapped, murdered, raped, molested, falsely imprisoned, and sex trafficked. ANA is responsible for the kidnappings and the conspiracy to kidnap because she was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. ANA participated in the conspiracy to rape , molest, falsely imprison, and sex traffic the Plaintiff and her children. ANA was aware of and participated in the attempted murders of the Plaintiffs. Additionally, ANA colluded with a vast network of co-conspirators to unlawfully dispossess the Plaintiffs of their intellectual and real property. ANA and her co-conspirators also worked cohesively steal the Plaintiffs identity while blackballing BIGGERS from professional wrestling, athletics, the entertainment industry, and the workforce. These actions were taken for the advancement of their criminal enterprise
1349. TODD KRESS and FLORIDA STATE UNIVERSITY colluded and conspired to blackball BIGGERS from college volleyball and prevent her from obtaining a college education. is responsible for the kidnappings and the conspiracy to kidnap because he was aware of the kidnappings, knowingly and intentionally assisted in the kidnappings, and unlawfully concealed the location of the kidnapped children. KRESS participated in the conspiracy to rape , molest, and sex traffic BIGGERS and her children. KRESS was aware of and participated in the attempted murders of the Plaintiffs. KRESS also

conspired to deprive BIGGERS of her college education, instructed her volleyball teammates to target her, and worked to blackball BIGGERS from college volleyball.

1350. University of Texas Austin colluded and conspired to prevent BIGGERS from obtaining her college education and worked to blackball her from college basketball.
1351. University of South Florida colluded and conspired to prevent BIGGERS from obtaining a college degree.
1352. EVEREST UNIVERSITY, JILL MALONE, and CORINTHIAN COLLEGES colluded to prevent BIGGERS from maintain her employment, assisted in the theft of her car, and assisted the criminal enterprise in stalking BIGGERS and her children. They also participated in and assisted in the kidnapping of BIGGERS children.
1353. MARY ROSNER allowed and assisted in the fraudulent alteration of BIGGERS domestic violence protective order issued from her Dona Ana County Court. ROSNER'S actions resulted in the prolonged kidnapping of M.F. and her unlawful concealment from BIGGERS in direct violation of the Protective Order that Rosner initially issued. BIGGERS order of protection was altered without a hearing changing custody of BIGGERS daughter to FULTON who was the listed offender and abuser identified in the protective order. MARY ROSNER never corrected her error.
1354. LAUREN ANGELO , CHARANYA VISWANATHAN ,ROBIN MCCABE ,CHRISTINA KANSKO, and ELIZABETH RAIMOND of the NEW YORK COUNTY DEFENDERS OFFICE conspired with the STATE OF TEXAS and the MANHATTAN DISTRICT ATTORNEY'S OFFICE to kidnap BIGGERS and falsely imprison her in New York for the second time.
1355. OFFICER PAUL PAOLI EPPD #3155 , DETECTIVE CHARLES VERA EPPD #2883, SGT. ROSALYN CARRASCO EPPD # 2317 ,LT. ROBERT NIETO EPPD #1828 , DETECTIVE RAUL RIVERA EPCSO #1373 ,DETECTIVE DELMA VELIZ EPCSO #1178 ,DETECTIVE JOSE DE LA O EPCSP#4917 ,DEPUTY PEDRO MORENO EPCSO #2975 , DEPUTY SAMUEL MAGALLANES EPCSO #4916,SGT. NOE JUAREZ EPCSO #7648 ,SGT. ROBERT MCCORD LAS CRUCES PD ,DETECTIVE GREG MILLER SUFFOK COUNTY PD #1049 ,JULIETTA ARREDONDO ,JACOB CHESTER WILLIAMS ,DEPUTY REYMUNDO MUNOZ EPCSO #5431 , ASHLEY FULTON, and XAVIER FULTON all agreed to conspire with the STATE OF TEXAS to provide false statements and to lie on the stand in their efforts to falsely imprison BIGGERS and to kidnap BIGGERS children including co-plaintiffs M.F. and Z.S. Each of these Defendants intent to assist in the conspiracy against the Plaintiffs civil rights is in evidence as they appear on the "States Witness List" in the fictional and fraudulent case by THE STATE OF TEXAS against BIGGERS. Their efforts are for the concealment of rapes , assaults, stalking, molestation sex trafficking and kidnapping of BIGGERS and her children to advance KURT ANGLE'S Criminal enterprise.
1356. SGT ROBERT MCCORD of LAS CRUCES PD refused to enforce BIGGERS protective and custody orders after she met with him and showed him evidence of the kidnappings. MCCORD likewise was fully aware of the kidnappings, communicated with the kidnappers, the approached BIGGERS at La Casa domestic violence shelter to scream at her and call her a liar when he was fully aware that BIGGERS and her children had been kidnapped. MCCORD then told BIGGERS that he communicated with the STATE OF TEXAS and that they were "upset with her" because she had obtained custody and protective orders for herself M.F. and Z.S. prior to their kidnappings.
1357. Additionally, Manhattan Assistant District Attorney TRAVIS HOLMES , "HOLMES" was assigned to a criminal case against SHLEDON JACKLER "JACKLER" after JACKLER was arrested for strangling the Plaintiff on behalf of the criminal enterprise on or about 04/03/2021.
1358. Although HOLMES is in possession of video footage of JACKLER attempting to break into the Plaintiffs apartment and then strangling her, HOLMES and ALVIN BRAGG unjustifiably dismissed the criminal case against JACKLER. Just like the Allegheny County District Attorney and The El Paso County District Attorney, HOLMES denied the Plaintiff access to crime victims services and

intentionally failed to inform the Plaintiff of hearings, and failed to inform the Plaintiff that the criminal charges against JACKLER had been dismissed.

DAMAGES AND PRAYER FOR RELIEF

WHEREFORE ,the Plaintiffs, TRENESHA BIGGERS, M.F., and Z.S. demand Judgement against the Defendants for their actions in each of the Counts described in this complaint. The Plaintiffs also Pray for:

1359. Compensatory damages against the Defendants for all past losses, future economic losses, and expenses incurred by the Plaintiffs as a result of the Defendants misconduct described in each count of this Complaint;
1360. General damages for all past, present, and future physical pain, mental suffering, and emotional distress suffered by the Plaintiffs, and Punitive damages to the fullest extent permitted by law;
1361. Plaintiffs pray for treble damages, Pre-judgement and Post-Judgement interest ;
1362. Declare that the Defendants' acts taken in their official capacities as alleged above violate the First, Fourth, Fifth, Sixth, and Fourteenth amendments to the United States Constitution
1363. Plaintiffs are seeking a minimum of \$3 Billion in damages from JOHN HUETT, DORIS HUETT WILLIAMS, LARRY LAWRENCE, and KURT ANGLE for orchestrating the life long unfounded and savage attack on the Plaintiffs lives.
1364. Each Court Order obtained to assist in the kidnapping of BIGGERS children be declared void, and that each of BIGGERS kidnapped children including but not limited to the co-Plaintiffs Z.S. and M.F. be immediately returned to her unharmed.
1365. Declare that the Defendants actions taken in their individual capacities as alleged above violate the First, Fourth, and Fourteenth Amendments to the United States Constitution
1366. Injunctive relief that Orders Judge Angie Barill, Ashley Martinez, Bill Hicks, and the El Paso County District Attorney's office to immediately cease and desist from pursuing the fictitious criminal cases against BIGGERS initiated from their office.
1367. Order the EL PASO TIMES NEWSPAPER to retract their fictitious report of BIGGERS being "El Paso's Most Wanted"
1368. Injunctive relief in the form of Ordering BIGGERS former roommate Judge ANGIE BARILL to cease from endangering the Plaintiffs lives and recall the fictitious arrest warrant that she issued on 12/14/2022.
1369. Order the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE and the MANHATTAN DISTRICT ATTORNEY'S OFFICE to cease and desist from conspiring to falsely imprison and kidnap BIGGERS from New York City .
1370. Order the EL PASO COUNTY DISTRICT ATTORNEY'S OFFICE and THE MANHATTAN COUNTY DISTRICT ATTORNEYS OFFICE to turn over BIGGERS complete file as well as Order them to return all unlawfully seized evidence, all stolen electronic devices, and all media storage seized to her immediately.
1371. Injunctive relief Ordering NEW YORK CITY ACS to locate BIGGERS kidnapped children, M.F. and Z.S.; and to immediately present them to the Court to be returned to her or;
1372. That this Court grant Emergency Orders and Injunctive relief in the form of Ordering NEW YORK ACS to correct their error in removing M.F. and Z.S. without a Court order, correct their

- error of kidnapping M.F. and Z.S., and immediately return them to BIGGERS care and control or;
1373. This Court Order NEW YORK CITY ACS to show cause as to why they assisted in the kidnapping of M.F. and Z.S. and to immediately present M.F. and Z.S. to the Court to be returned to BIGGERS.
1374. BIGGERS prays this Court Order ANDREW GALLOWAY aka XAVIER FULTON and EPHRAM SIMS to present the kidnapped children to the Court unharmed, or;
1375. This Court Order the NYPD and the FBI to intervene in the kidnapping , pursue criminal charges against the kidnappers of M.F. and Z.S., and return them to BIGGERS care and physical control unharmed.
1376. For each Attorney, Judge, and law enforcement agent who knowingly and intentionally participated in the Conspiracy to deprive the Plaintiffs of their civil rights, kidnap, and falsely imprison the Plaintiffs be disbarred, impeached, decertified, removed from office, fired, or forced to resign.
1377. Order FRANCESCA AMATO to immediately return BIGGERS stolen laptop and the entire criminal enterprise including the EL PASO DISTRICT ATTORNEY'S OFFICE to return all of BIGGERS stolen electronic devices and accounts.
1378. Plaintiffs pray that each named Defendant be Ordered to publicly retract their lies and defamatory statements made about the Plaintiffs.
1379. All named Defendants who obtained Plaintiffs property by theft and fraud be ordered to immediately vacate the premises and return the property to BIGGERS care and control.
1380. All named Defendants whom stole the Plaintiffs intellectual property, including WORLD WRESTLING ENTERTAINMENT, ALL ELITE WRESTLING, and TONY KHAN cease from using the property and relinquish all profits made to the Plaintiffs.
1381. All named Defendants that are unlawfully withholding and have previously unlawfully withheld BIGGERS salary and wages, including but not limited to WORLD WRESTLING ENTERTAINMENT, IMPACT WRESTLING, and CORINTHIAN COLLEGES, be Ordered to release BIGGERS earnings to her immediately
1382. Each named Defendant who crossed the border into the United States with the intent to commit felonies against the Plaintiffs be deported to their country of origin.
1383. Injunctive relief and Temporary orders sufficient to protect Plaintiffs from the operations of their criminal enterprise.
1384. Injunctive relief and Orders that forces the defendants to cease and desist targeting the Plaintiffs and violating their civil rights.
1385. Injunctive relief and Orders to force the defendants to cease and desist their ongoing war against the United States Constitution.
1386. Plaintiffs pray for a precedent setting judgement against the Defendants that completely depletes their criminal enterprise of its resources , deters the future formation / operation of any similar enterprises, and protects both the Plaintiffs and the public from future harm.
1387. A Jury Trial on all specified Counts in this Complaint.
1388. Such other further specific and general relief that may become apparent from discovery as this matter matures for trial.

Respectfully Submitted,
Trenesha Biggers, Pro Se
Trenesha Biggers, Pro Se